Lycopodium

# Reko Diq Mining Company

## Reko Diq Copper Gold Project

## Health, Safety and Environmental Management Plan

2270-0000-HPLN-001

March 2024

REKO DIQ MINING COMPANY

APPROVED COMPANY ISO 45001 Occupational Health & Safety Management Systems
QMS Certification Services
APPROVED COMPANY ISO 14001 Environmental Management Systems
QMS Certification Services
JAS-ANZ

| REV NO. | DATE | DESCRIPTION OF REVISION | BY | DESIGN APPROVED | PROJECT APPROVED | CLIENT APPROVED |
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# Reko Diq Copper Gold Project

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**ABBREVIATIONS / DEFINITIONS IN THIS DOCUMENT**

| | |
|---|---|
| Breath Alcohol Concentration | BAC |
| Behavioural Observation | BO |
| Construction Contractors, Vendors | Contractor |
| Environment and Social Responsibility | ESR |
| Hazard and Operability | HAZOP |
| Health, Safety and Environmental | HSE |
| Health, Safety, and Environmental Management Plan | 'the Plan' or 'the HSEMP' |
| Health, Safety, and Environmental Management System | 'HSEMS' |
| Job Hazard Analysis | JHA |
| Lost Time Injury | LTI |
| Lycopodium Minerals Pty Ltd | Company |
| Medical Treatment Injury | MTI |
| Mobile Work Platform | MWP |
| Permit to Work | PTW |
| Personal Protective Equipment | PPE |
| Project Manager | PM |
| Red, Green, Blue, Yellow | RGBY |
| Reko Diq | Site |
| Reko Diq Project | 'the Project' |
| Reko Diq Mining Company | Client |
| Run of Mine | ROM |
| Restricted Work Injury | RWI |
| Scope of Work | SOW |
| Safe Work Method Statement | SWMS |
| Third Country National | TCN |
| Total Recordable Injury Frequency Rate | TRIFR |
| Workplace Risk Assessment Controls | WRAC |

# 1.0 PROJECT SCOPE

The Reko Diq project ('Project') in Pakistan is one of the largest undeveloped copper-gold projects in the world. The Reko Diq Mining Company Limited ('Client') is owned by Barrick (50%), three Pakistani federal state-owned enterprises (25%) and the Province of Balochistan (25%).

Lycopodium Minerals Pty Ltd ('Company') has been engaged by the Client to provide early works on the Project including:

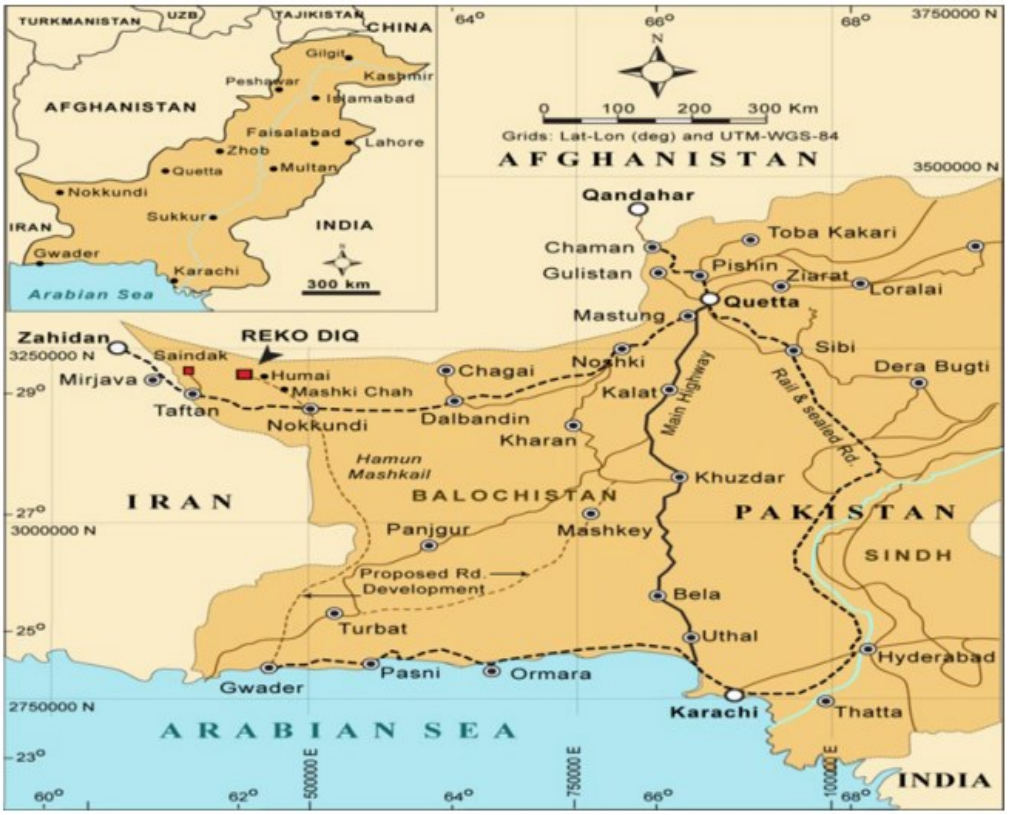
- Pioneering water distribution
- Construction water supply
- Construction water distribution
- Village
- WTP and WWTP
- EPCM construction facilities
- Vehicle maintenance facility
- Construction diesel storage and distribution
- Access roads
- Establishment of crushing / screening services / facilities.

## 1.1 Project Location

The Project is located in the western Chagai region, Balochistan, Pakistan. The site is approximately 35 kilometres south of Afghanistan and approximately 80 kilometres east of Iran. The distance from the provincial capital, Quetta, to the Project is approximately 587 kilometres.

The approximate coordinates for the site are 29.139801521422125, 62.11374874884293.

**Figure 1.1 Project Location**




## 1.2 Project Environment

The region is a semi-arid desert environment with frequent sandstorms, predominantly in the summer months and potential flash floods in the winter months, December – February.

The landscape is characterised by subdued topography consisting of irregular low and high hills, undulating sand-dunes, extensive playas (Hamuns) and dry alluvial plains covered with scree and minor vegetation in the valleys.

The climate varies from extreme heat, reaching up to 48 degrees Celsius in summer, to severe cold, -10 degrees Celsius in winter. The prominent wind direction is NNW in summer and NNE in winter. Rainfall is low and mostly occurs during winter months, with December having the highest precipitation of up to 82 millimetres of rain.

The wildlife and vegetation are limited due to the desert environment with heavy sandstorms and lack of water in the region, however a number of snake, lizard, scorpion, spider, rat and desert mammal species inhabit the region. The area is also known for its migratory birds such as the Siberian Crane, known locally as 'Churz'.

Vegetation includes minor desert shrubs and small desert plants known locally as 'Gaz' in the stream beds.

The western Chagai region is sparsely populated, with the residents located mainly along the N-25 National Highway in the towns of Nokkundi and Taftan and other scattered villages notably in Durban Chah, Mashki Chah, Humai, Siah-Reg and Amalaf.

The majority of the population is ethnically Baloch, working as small traders, government servants, labourers, and skilled workers in the mineral exploration, mining and other development projects in the region.

## 2.0 INTRODUCTION

The Company has developed this Project Health, Safety and Environmental Management Plan ('HSEMP', or 'Plan') to effectively manage workplace health, safety and environmental hazards. The framework takes into consideration, and addresses the requirements of:

- The Client's 6105-0000-HA12-0001 Occupational Health & Safety (OHS) Management Plan
- The Company's HSE standards as specified in the HSE Management System
- In-country legislation
- Australian and/or International standards.

The Plan provides a clear understanding of the Company's HSE Management System, its purpose and practical guidance for implementation.

The requirements contained in this Plan are applicable to the scope and activities designated under the control of the Company under the Agreement.

Contractors are responsible for implementing and managing their own Project Health, Safety and Environmental Management plan, which will align with this Plan. The Company's Project team have a responsibility to lead, monitor, support, guide and audit Contractors on site to confirm compliance to the Project HSE standards outlined in this plan.

The Plan is based on the Company's belief that 'All Incidents are Preventable'. To achieve this goal, a commitment is required from all Project personnel to operate in accordance with the Plan, the Company's 'Core Rules We Live By' and the Company's Code of Conduct. The success of the Project depends upon the collaboration and contribution of all parties on the Project including the Client, Company, Contractors and Subcontractors.

The Project safety philosophy is based upon ethical conduct, mutual trust, respect and teamwork. At risk behaviours will not be tolerated and proactive re-enforcement of positive behaviour, as well as visible leadership, are the focus of the Project.

The checklists in Appendices A and B supplement the Plan and are intended as practical tools for the Company and Contractor to monitor compliance with the requirements of the Plan throughout the implementation of the Project.

# 3.0 HSEMP SCOPE

The Plan applies to the Reko Diq Project Site ('the Site') and all areas of the Company's scope of work, including all Company employees, contractors, subcontractors, visitors or any other persons conducting work on behalf of the Company.

The requirements contained within this Plan apply to all area of the Company's scope of work including offices, accommodations, Project sites, laydown areas and any other areas where Project personnel may work in the normal course of Company operations.

This Plan has been developed to apply the Company's HSE Management System. Where an inconsistency occurs, the Company will assess the risks relating to the inconsistencies to confirm that it does not introduce additional risks to personnel, the environment or property. The Company policies, plans, guidelines, procedures, standards, forms registers and appendices referred to in the Plan are the minimum compliance requirement. Compliance with the Plan including appendices and other referenced documents is mandatory.

All stages of the Company's scope on the Project will comply with the Company's Plan, including, but not limited to:

- Design and engineering
- Planning
- Procurement
- Logistics
- Construction
- Commissioning.

# 4.0 KEY OBJECTIVES, PERFORMANCE MEASURES AND TARGETS

## 4.1 Client Objectives, Performance Measures and Targets

The Client's key health and safety objectives are to:

- Ensure health and safety hazards and risks are identified and controlled.
- Avoid injuries to the workforce.
- Promote a culture of health and safety.
- Continually improve safety performance.
- Ensure health and safety actions are implemented efficiently and actively.

## 4.2 Project Performance Measures and Targets

Project performance measures and targets were determined by the Company, in alignment with the Client.

The Company will include within its monthly reports an update on progress against the performance measures and targets tabled herein, including any other internal indicators.

**Table 4.1 Performance Measures and Targets**

| Key Result Area | Objective | Performance Measures and Targets |
|---|---|---|
| Legislative | Compliance with relevant regulations, license or permit conditions. | No breaches of regulations, licence or permit conditions. |
| Key Performance Indicators - Lag | A workplace that is free of incidents during the contract period.<br>TRIFR ≤ 2.11 | • Zero occupational illnesses or injuries (Fatalities / LTI / MTI).<br>• LTIFR 0.00<br>• TRIFR ≤ 2.11<br>• Zero legislative citations or non-conformances.<br>• All frequency rates are to be calculated at 1,000,000 manhours.<br>• Incident reports completed and corrective actions closed out within required timeframes. |
| | A workplace that is free of environmental incidents during the contract period.<br>Equal or better than EIFR ≤1.5. | • Zero significant environmental incidents (Level 3 or above).<br>• Zero legislative citations or non-conformances.<br>• All frequency rates are to be calculated at 1,000,000 manhours.<br>• Incident reports completed and corrective actions closed out within required timeframes. |
| Key Performance Indicators - Lead | Contractor HSEMP.<br>Open and honest communication between all levels of the organisation. | Meets Project requirements.<br>• Pre-start Inspection (PSI) Meetings; one per shift / per work group.<br>• Toolbox Meetings; one per week. |
| | All workers aware of Duty of Care, general construction hazards and right to cease unsafe work. | • All persons inducted. |

| Key Result Area | Objective | Performance Measures and Targets |
|---|---|---|
| | Safe workplace. | • One daily workplace HSE Inspection per HSE personnel (Company, Contractor).<br>• One weekly workplace HSE Inspection per Supervisor / Manager (Company, Contractor).<br>• Monthly HSE Contractor Audit (Company).<br>• Weekly site safety inspection by Lead HSE per week (Company).<br>• Two Behavioural Observations per week per Supervisor / Manager (Company, Contractor).<br>• Preparation of JHA – For same, place, same task, same hazards validity is up to 1 week, otherwise re-written weekly (Contractor).<br>• Preparation of Safe Work Method Statement required for all high risk construction activities. |
| | Safe plant and equipment. | • Pre-mobilisation inspections: to be completed by a third party contractor with LMPL oversight<br>• Documented daily pre-start checks on all plant (Contractor).<br>• Quarterly inspection of all ladders, electric hand tools and leads, rigging equipment, ladders, and fall prevention equipment (Contractor). |
| | Compliance with the HSE Standards. | • Monthly HSE Contractor Audit (Company).<br>• <5 non-conformances occur monthly.<br>• Non-conformances are closed out within 7 days. |
| | Fitness for Work. | • Random BAC testing of XX% of workforce daily.<br>• Random drug testing of XX% of workforce daily.<br>• 100% BAC and drug testing post-incident.<br>• For cause BAC and drug testing.<br>• 100% pre-employment alcohol and drug screening of workforce.<br>• Workforce participation in random alcohol and drug testing program. |
| | 100% of workforce inducted prior to commencing work. | • 100% compliance. |
| | 100% compliance with training requirements. | • 100% compliance. |
| | Formal disciplinary action for all breaches of Fatal Risk Standard, policy, Code of Conduct and "*Core Safety Rules We Live By*". | • Documented. |

Project performance measures and targets are also outlined in Appendix B Project HSE Responsibility Checklist.

# 5.0 LEGISLATIVE REQUIREMENTS

The Company is committed to complying with the relevant legislation in the Project jurisdiction.

This includes:

- Mines Act 1923
- Consolidated Mines Rules 1952
- Metalliferous Mines Regulation 1926
- Balochistan Occupational Safety and Health Act 2022
- Balochistan Workers' Compensation Act 2022.

Where the above legislation is less stringent than the Australian equivalent, or an equivalent law or regulation is not available, the following will be referenced and provide the minimum standard:

- Western Australia Work Health and Safety Act 2020
- Western Australia Work Health and Safety (Mines) Regulations 2022
- Western Australia Codes of Practice
- Australian / International Standards, Guidance Notes and Industry Standards.

## 5.1 Australian / International Standards

Australian Standards form a minimum basis for site construction reference, including high risk works, these standards are deemed as the minimum acceptable requirement. When AS/NZS standards are unable to be met, Contractors will propose an equivalent International Standard or risk control strategy that will be subject to prior approval, in writing, by the Company.

## 5.2 Changes to Legislative and Other Requirements

The Company will take reasonable steps to monitor and report on changes to legal and other requirements during construction and commissioning. This may result in relevant notifications (memorandums, emails, etc.) to relevant stakeholders. The Contractor is responsible for maintaining awareness and confirming compliance to any legislative changes.

## 5.3 Evaluation of Compliance

The Company will undertake a periodic evaluation of compliance against legal and other requirements as part of the audit process. Audit tools and other systems processes must verify that legal and other requirements are comprehensive and relevant to legal requirements, contractual agreements, and scope of work.

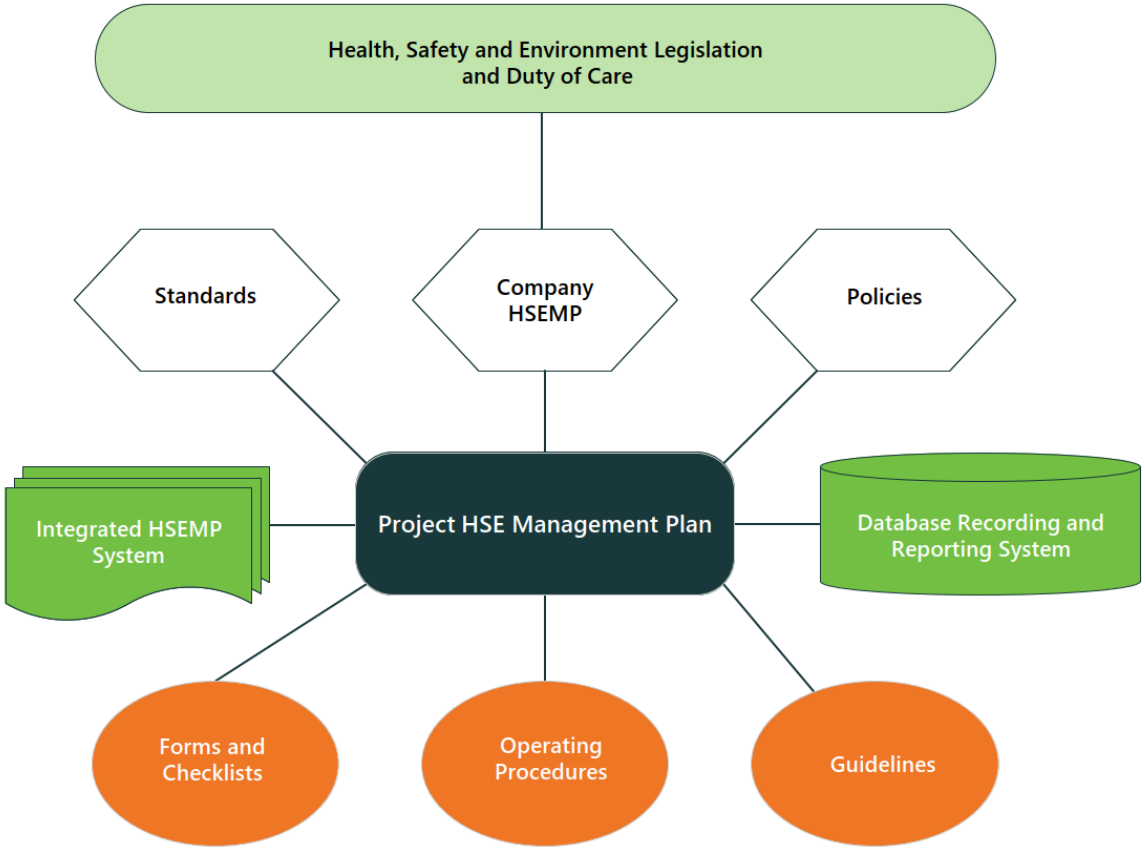
# 6.0 HSE MANAGEMENT SYSTEM

The Company's HSE Management System (HSEMS) provides a structured framework including policies, plans, guidelines, procedures and standards to systematically manage health and safety and environmental aspects.

The Company's HSEMS is accredited to management standards AS NZS ISO 45001:2018 Occupational Health and Safety Management Systems and AS NZS 14001:2016, which identically adopts ISO 45001 and ISO 14001. The management standards outline the core requirements of the Company's HSEMS.

The Project's Environmental Management Plan forms part of the HSEMS, and is subordinate to this Plan.

**Figure 6.1 HSE Management System**




Contractor compliance with the Company's HSEMS is monitored by the Company's Project team.

An electronic project management database ('Project Wise') has been developed to assist with the collection and recording of all relevant data and information. The Project database and the resultant documents have been integrated into the HSE management systems.

# 7.0 COMPANY VALUES

## 7.1 Lycopodium Values

Lycopodium has three core values; Respect, Integrity and Diligence. Our core values reflect the guiding principles we apply each day in how we treat each other (with Respect), how we act (with Integrity), and our approach to the work we do (with Diligence). They are inherent in who we are, as individuals, and collectively as a Company.

Our Values

Respect, Integrity & Diligence

## 7.2 Lycopodium Health, Safety, Environment and Community Relations (HSEC) Policy Statement

Health, Safety, Environment and Community Relations Policy Statement BRM-POL-004 is provided on the next page. All Project personnel are responsible for complying with this policy. Breaches of the Company's HSEC Policy Statement will be managed in accordance with the disciplinary procedure HRM-PRC-010.

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## HEALTH, SAFETY, ENVIRONMENT AND COMMUNITY RELATIONS POLICY STATEMENT

Lycopodium recognises that successful workplace health, safety and environmental management is of primary importance in the successful pursuit of business activities.

Lycopodium is committed to conducting its operations in a manner that will not cause workers, contractors or other persons to be put at risk. Further, Lycopodium is committed to minimising and mitigating direct and indirect environmental aspects. Lycopodium will take all reasonably practicable steps to eliminate and minimise risks to health, safety and the environment in the pursuit of our goal of zero injuries to people and zero environmental impacts to those communities in which we operate.

Lycopodium will do its utmost to:

- Improve work practises towards achieving a goal of zero injuries, zero environmental impacts and leaving only positive legacies upon communities in which we operate.
- Abide by the work health and safety laws and standards, and the environmental regulatory systems, applicable to the locations in which we operate.
- Implement a risk management framework to identify and eliminate or minimise risks.
- Provide safe plant and structures for safe work activities.
- Ensure leaders are accountable for Health, Safety and Environmental risks.
- Provide relevant policies, procedures, systems and training to enable effective management of Health, Safety and Environmental activities.
- Establish clear, measurable targets, objectives and initiatives to improve the health and safety performance on all projects.
- Provide effective consultation and communication both internally and externally for the participation in and the dissemination of Health, Safety and Environmental information.
- Actively respond to and investigate all incidents and near misses to prevent recurrence.
- Maintain the Health and Safety Management System in accordance with AS/NZS ISO 45001:2018 and Environmental Management Systems to AS/NZS ISO 14001:2015.
- Protect the environment including the prevention of pollution in the areas where we operate.
- Recognise the importance of collaborating and cooperating with our employees in the continual improvement of a safe and healthy workplace and environmentally sustainable future.

All employees have a responsibility to work safely, comply with any reasonable verbal or written instruction, and take good care that their acts or omissions at work do not adversely affect the health and safety of other persons or adversely affect the environment.

**KARL CICANESE**
**MANAGING DIRECTOR**

**November 2023**

## 7.3 Lycopodium Core Rules We Live By

The Company's BRM-REF-041 Core Rules We Live By are detailed below. Breaches of the Core Rules We Live By will be managed in accordance with the Company's Disciplinary procedure (HRM-PRC-010).

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CORE SAFETY RULES WE LIVE BY

**Operation of Equipment and Vehicles:** We only allow competent and authorised personnel to operate or modify equipment. Only authorised plant and equipment maintained in safe operating condition shall be permitted on-site.

**Excavation and Trenching:** We will not commence trenching or excavation work unless an excavation permit has been submitted, cleared by electrical and mechanical supervisors, registered by survey and an as-built drawing prepared, and the permit approved.

**Cranes and Material Handling:** We only allow certified, competent persons to operate any crane, use workboxes or sling loads. Barricades shall be placed around the swing radius of cranes. Personnel working with cranes should never pass inside the radius of the boom and loads should never be lifted over people at work. Rigging equipment that is in an unsafe condition shall not be used on site.

**Openings and Walkways:** We will make all floor, roof and platform openings safe. No grid mesh, floor grating or chequer-plate shall be removed without an authorised permit in place.

**Working at Height:** We will use a safety harness whenever work is being undertaken where there is a risk of falling from one level to another. In all cases where a safety harness is worn, the wearer shall be tied off 100% at all times. Work positioning lanyards shall be used to prevent falls where personnel are required to carry out their work near an unprotected edge.

**Mobile Work Platforms:** We only allow certified and competent personnel to operate mobile work platforms. Personnel must wear a full body harness and attach a lanyard with fall arrester to an attachment point. Personnel shall not enter or exit from the platform when elevated, except in the case of an emergency or when 100% tied off. Barricades shall be placed around the swing radius of mobile work platforms.

**Isolation:** We will never work on equipment that is not isolated from hazardous energy sources. The removal of another person's personal danger tag and padlock is prohibited. Removing, bypassing or modifying a safety device without authorisation is prohibited.

**Overhead Power Lines:** We will not allow any work to be carried out above live overhead power lines. Work within the agreed site stand-off distances for live overhead powerlines is prohibited. No plant shall be operated within the agreed site stand-off distances or operated where the plant could come into contact with live overhead power lines.

**Drugs and Alcohol:** We have a zero tolerance of alcohol and drug abuse. Participation and cooperation with random and causal testing and daily BAC testing is mandatory on all project sites.

**Housekeeping:** We keep our work areas orderly and maintained to a high standard. Our walkways, crib rooms, laydown areas, stairways, delivery and storage areas, offices, scrap and waste areas must be kept free of debris and materials, and trip hazards.

**Personal Protective Equipment**: We always wear Personal Protective Equipment in accordance with the information and training provided and will not misuse or damage Personal Protective Equipment.

Always intervene and report any breach of these ***'Core Rules We Live By'***. You may save a life!

## 7.4 Lycopodium HSE Values and Expectations

The Company's HSE Values and Expectations BRM-REF-043 are provided below. Breaches of the Company's HSE Values and Expectations will be managed in accordance with the Company's Disciplinary procedure HRM-PRC-010.

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### HSE VALUES AND EXPECTATIONS

**We Value Safety**

- The health and safety of people takes precedence over the attainment of other objectives.
- Safety, productivity, and quality are mutually supportive and safety is integral to each job. The safe way to do things is the best and most effective way and each of our actions must reflect this commitment.
- Everyone has the right to a safe and environmentally protected workplace. Injuries, occupational illnesses, and environmental incidents are preventable.
- We each commit to take all steps necessary to guarantee personal safety, the safety of others and protection of the environment in our daily activities.
- The **'Core Rules We Live By'** apply to all our people without exception. Our Supervisors must maintain an atmosphere where health, safety and environmental concerns can be brought forward without fear of reproach.

**We Expect Compliance with the Law and Regulations Wherever We Operate**

- We recognise that health, safety and environmental protection is accomplished through compliance with laws, regulations, and best management practices.
- Our HSE Management Plans define the applicable health, safety, environmental and community relations laws and regulations. Compliance with these laws is required.

**We Expect Our Leaders to Take Responsibility for the Safety of People and for the Protection of the Environment in which We Work**

- The safety of people and impacts on the environment are line management responsibilities.
- Everyone in line management is responsible and accountable for the prevention of injuries and protection of the environment in their daily work.
- As role models we must demonstrate our commitment to health, safety and the environment in our daily activities.

**Each of Us Takes Personal Responsibility for the Safety of Ourselves, Other People and for the Protection of the Environment and Community**

- We each understand that safety excellence is the product of the way we think and that the way we think affects our actions. Our thinking begins with the proposition that **'We Value Safety'.** We encourage our clients and contractors to adopt our values through confident leadership and example.
- We each commit to continuous improvement in health, safety, environmental protection and community relations consistent with the Lycopodium Corporate HSE Management Plan.

**We Value People and the Environment**

### 7.4.1 Safety Incentive Scheme

A Project safety incentive scheme will reward positive safety behaviour and culture that aligns with HSE Values and Expectations. Contractors will create and implement their own plan; this plan will be approved by the Company.

## 7.5 Lycopodium Code of Conduct

Workers should always use care and diligence when fulfilling their role or representing the Company or its Clients, and not engage in any conduct likely to impact the reputation of or bring discredit upon the Company or its Clients. The Company's Code of Conduct HRM-GUI-L-002 sets out threshold expectations of behaviours for workers in general terms, while not covering every set of circumstances.

All workers have an obligation to comply with the Company's Code of Conduct. Failure to adhere to the Code of Conduct may result in disciplinary action following investigation, up to and including termination of employment.

When representing the Company and its Clients, workers must at all times:

- Perform their duties with proficiency, integrity and diligence in a fair and equitable manner.
- Comply with all Company policies and procedures, instructions and lawful directions that relate to their employment duties and speak up when issues are known.
- Endorse the interests of the Company and conduct themselves in a way that promotes the ethos of the business.
- Act with total honesty and with high standards of personal integrity and in good faith, including showing respect for Client property and facilities.
- Perform duties in a safe, efficient, sustainable and collaborative manner.
- Exercise equality, respect, courtesy and sensitivity in all dealings with internal and external stakeholders.
- Avoid real or perceived conflicts of interest, and avoid any behaviour that could harm the Company or Clients reputation or relationships with local communities.

**Employment Practices**

The Company endorses diversity, supports equal rights, and does not advocate, support or practice discrimination based on race, religion, age, national origin, language, sex, sexual orientation, or mental or physical handicap, whether covered by applicable legislation or not, except where affirmative action may be required to redress individual or social handicaps of people from disadvantaged groups.

The Company also does not tolerate any acts of harassment or forms of discrimination.

Workers must:

- Respect the religious beliefs, traditions and customs of all workers and their right to practice those activities without external intervention, disturbance or protest.
- Not engage in any political activities outside of your point of hire or country or origin while at work and representing the Company.
- Abstain from the giving or receiving of bribes, cash or other incentives.
- Whilst working outside country of origin, abstain from the practice of casual sexual relationships within the local community.
- Abstain from physical violence or harassment of any person or persons.

## 7.6 Project Behaviours

All Project personnel are expected to comply with the following:

- Commit to the Company's HSEC Policy Statement.
- Commit to the Company's HSE Values and Expectations.
- Comply with the Company's policies, Core Rules, procedures and guidelines.
- Abide by the applicable laws and regulations.
- Respect use of the provided accommodation, transport and facilities.
- Present to work in a condition in which workers are able to carry out their duties without risk to themselves or others and free of adverse effects such as fatigue, stress, alcohol or other drugs, or injury / illness.
- Not leave the Project site without the specific approval of the appropriate Contractor or Company representative.
- Not engage in any political activities outside of our own country.
- Not discriminate against any person on the grounds of sex, age, race, religion, political belief, family or marital status, national origin, sexual orientation, disability, body size or shape.
- Respect the religious beliefs, traditions and customs of the local workers and in all circumstances respect their rights to practice those activities without external intervention, disturbance or protest.
- Abstain from the giving or receiving of bribes and/or cash or other incentives.

- Conduct all interactions in the community and with members of the community in a professional manner; this includes abstaining from the practice of casual sexual relationships within the local community.
- Abstain from physical violence to/or harassment of any person or persons.
- Abstain from the use of coarse language and always address all people in a courteous manner.
- Project personnel are reminded of their status as a guest in the local community and should respect the laws, customs, culture and religious beliefs of the community and its people.

Any person failing to comply with the Project behaviours will be managed in accordance with the Company's Disciplinary procedure (HRM-PRC-010).

# 8.0 PROJECT HSE DUTIES AND RESPONSIBILITIES

The Company has a primary duty to ensure the health and safety of workers while they are at work in the business or undertaking and others who may be affected by the carrying out of work. Additionally, all Company and Contractor personnel including Subcontractors have a duty of care to make sure that they and other people are safe in the workplace and to care for the environment in accordance with statutory obligations and moral responsibilities.

Role-specific HSE duties and responsibilities are defined in the sections below.

## 8.1 Company Project Manager

The Company's Project Manager has the overall responsibility for health and safety of all personnel involved in the Project. The Company's Project Manager will establish the necessary policies, procedures and resources for implementing effective incident prevention and risk management process to meet the HSE needs of the Project.

The Company's Project Manager must exhibit leadership and commitment to safety throughout all phases of the Project, responsibilities include:

- Actively engage in all HSE matters and champion the implementation of the HSE Management Plan.
- Appoint / manage sufficient competent persons as may be required to assist with the effective management of the HSE objectives of the Project.
- Together with the Project team leading by example, modelling the behaviour expected from all employees performing work in a safe manner.
- Communicate to the Project team and contractors that cost, schedule, and quality will not diminish the importance of HSE implementation.
- Actively promote HSE performance objectives to the Company's Project team and Contractors though visible and felt leadership.

- Participate in HSE Audits and Inspections and interact with personnel and organisations concerning improving safe work practices on site, in accordance with the HSE Responsibility Checklist at Appendix B.
- Actively promote a HSE culture that mitigates the risk of injury to personnel and damage to plant, equipment, and the environment aspects of the Project.
- Establish and maintain clear responsibility and accountability for implementation of the HSE Plan.
- Allocate sufficient resources required to successfully implement the Project HSEMP.
- Report all matters relating to HSE to the Company's HSE Manager – HSE Group in a timely manner.

## 8.2 Construction Manager

The Company's Construction Manager has the overall responsibility for construction of the Project and for the implementation on site of the HSE Plan. The Company's Construction Manager will be assisted in an advisory capacity by the Company's HSE Manager.

The Company's Construction Manager's responsibilities include:

- Actively engage in all HSE matters and lead by example.
- Approve Contractor HSE Management Plans prior to their commencement on site.
- Promote open communication, cooperation, and trust between the Company and the Client, contractors, vendors, workers and vendors.
- Verify SWMS / JHAs, as applicable, are undertaken for on-site construction activities.
- Participate in HSE Audits and Inspections and interact with personnel and organisations concerning improving safe work practices on site, in accordance with the HSE Responsibility Checklist at Appendix B.
- Actively promote HSE performance objectives to the Company's Project team and Contractors though visible and felt leadership.
- Oversee the establishment of a practical HSE interface between contractors, enabling them to individually function in a safe, productive and harmonious manner.
- Confirm that regular monitoring and assessment of the various contract areas is carried out in relation to on-site Health, Safety, and Environmental activities.
- Recognise outstanding HSE performance in order to increase commitment and participation.

- Direct activities such that there is no adverse environmental or heritage impact brought about through construction activity on the Project.
- Mitigate the risk of personal injury, equipment and property damage and prevent recurrences to as low as reasonably practicable.
- Confirm a suitable competency verification program is established to assess Contractor personnel prior to operating vehicles, cranes, tele handlers, earthmoving equipment such as loaders, dozers and excavators, etc., and conducting rigging operations.
- Report all incidents to the Company's Project Manager in a timely manner.

## 8.3 Project Lead Superintendent

Project Leads have the overall responsibility for a discipline or physical area of construction, they are responsible for the implementation of the HSE Plan in their area of responsibility.

The Project Lead's responsibilities include:

- Being thoroughly familiar with the HSE Plan and with their individual responsibilities regarding its implementation and enforcement.
- Actively promote HSE performance objectives within their team and associated Contractors though visible and felt leadership.
- Promote open communication, cooperation, and trust between the Company and the Client, contractors, vendors, employees and suppliers.
- Verify SWMS, JHAs and/or Technical Procedures as applicable, for their area of construction activities.
- Participate in HSE audits and inspections, behavioural observations, and interact with personnel and organisations concerning to improving safe work practices in their area of responsibility, in accordance with the HSE Responsibility Checklist at Appendix B.
- Monitor and manage the practical HSE interface between their team and contractors.
- Confirm that regular monitoring and assessment within their area of responsibility is carried out in relation to on-site Health, Safety, and Environmental activities.
- Mitigate the risk of personal injury, equipment and property damage and prevent recurrences to as low as is reasonably practicable.
- Facilitate, attend and support toolbox and pre-start meetings, communicate and review information necessary for employees to work in a safe manner.
- Enforce H&S related work rules and take action as required to confirm compliance.

- Enforce the Project Fitness for Work Policy and procedural requirements.
- Evaluate the safety performance of assigned employees / Contractors and report findings to the Company's Construction Manager.
- Report all incidents to the Company's Construction Manager in a timely manner.

## 8.4 Supervisors and Engineers

Field Supervisors and Field Engineers are regarded as line management representatives by the Company and accordingly share the requirements of management accountabilities.

Supervisors are seen as the group that have the greatest impact on safety on the Project. Consequently, the Client and the Company expect Supervisors to lead by example and set the standard for safety in every construction activity. They will be held responsible for each of their on-site and statutory responsibilities which include:

- Be thoroughly familiar with the HSE Plan and with their individual responsibilities regarding its implementation and enforcement.
- Be directly involved in implementing the HSE Procedures applicable to their areas of responsibility.
- Review Contractor SWMS and/or Technical Procedures to confirm currency and adequacy, and sign off for acceptance.
- Participate in hazard analysis and facilitate SWMS / JHAs as applicable for work activities under their control.
- Take all reasonable action to optimise the environment, safety and health of each employee under their control. Additionally, Supervisors will emphasise the protection of equipment and property in their area of responsibility.
- Actively promote a HSE culture that mitigates the risk of injury to personnel and damage to plant, equipment, environment and heritage aspects of the Project.
- Participate in HSE audits, inspections and interact with personnel and organisations concerning improving safe work practices on site, in accordance with the HSE Responsibility Checklist at Appendix B.
- Facilitate, attend and support toolbox and pre-start meetings, communicate and review information necessary for employees to work in a safe manner.
- Implement immediate action to correct reported or observed unacceptable environmental, safety, and health conditions and/or behaviours.
- Conduct ongoing assessments of work areas and take necessary corrective actions to eliminate substandard practices, conditions, and/or behaviours.

- Participate in incident investigations and preparation of required reports.
- Enforce HSE related work rules and take action as required to confirm compliance.
- Enforce the Project Fitness for Work Policy and procedural requirements.
- Evaluate the safety performance of assigned employees / Contractors and report findings to their respective Superintendent.

## 8.5 HSE Manager

Serves as the Company's representative in all matters relating to HSE for the Project and will, upon notification to the Construction Manager, have the authority to cease work activity in the event of imminent danger to the health and safety of workers, the public, or the environment. Work activity may resume only after consultation with the Contractor concerned and the Company's Construction Manager. The Company's HSE Manager has a direct line reporting function to the Company's Construction Manager and functional responsibility to the Company's HSE Manager – HSE Group.

The Company's HSE Manager will report the Contractors' HSE performance to Company's Construction Manager and verify the systems and procedures contained in the HSE Plan and contractor HSE Plans are adequately meeting the objectives of the Project.

The Company's HSE Manager's responsibilities include:

- Provide professional HSE advice to the Company and contractor teams on site.
- Actively promote a HSE culture that mitigates the risk of injury to personnel and damage to plant, equipment, environment and heritage aspects of the Project.
- Review of the Client's Emergency Response and Emergency Evacuation Plans, and the development of Company Plans to align with core requirements.
- Actively promote HSE performance objectives to the Company's Project team and contractors though visible and felt leadership.
- Review all contractor HSE actual and statistical performance and provide appropriate advice to the Company's Construction Manager.
- Prior to mobilisation, confirm contractor understanding of / compliance with the requirements of the Mobilisation and Start-up Checklist at Appendix A, and Project HSE Responsibility Checklist at Appendix B.
- Monitor the implementation of the HSE Management Plan.
- Issue HSE bulletins and promoting clear communications of all safety, health, environmental and community issues.

- Monitor HSE status and driving the continuous improvement process to provide the best possible HSE direction for the Project.
- Coordinate all HSE activities with the Company, contractors and other organisations providing services on site to the Project.
- Maintain all the Company's HSE records on-site in accordance with Company, Client and statutory requirements.
- Review all incident investigations.
- Manage Fitness for Work Testing.
- Provide Site Inductions.
- Review and revise the HSE Plan when required following approval by the Company's Project Manager.
- Establish and monitor health, safety environmental and hygiene programmes as required.
- Assist governmental agency inspections as requested by the Company's Construction Manager.
- Submit monthly reports and statistical information to the Company's Construction Manager for review.
- Regularly attend and support Contractor pre-start and toolbox meetings.
- Attend all Contractors on-site kick-off meetings and Contractors weekly progress meetings.
- Participate in HSE Audits and Inspections and interact with personnel and organisations concerning improving safe work practices on site, in accordance with the HSE Responsibility Checklist at Appendix B.
- Confirm all Contractors are made aware of the Project site first aid facilities and verify Contractors provide adequate personnel trained in first aid.

## 8.6 Lead HSE Advisor, Senior HSE Advisors

Serves as the Company's field representative in all matters relating to HSE within their operational areas on the Project and will, upon consultation with the Company's HSE Manager, have the authority to cease work activity in the event of imminent danger to the health and safety of workers, the public, or the environment. Work activity may resume only after consultation with the Contractor concerned and the Company's Construction Manager. The Company's HSE Advisors have a direct line reporting function to the Company's HSE Manager.

HSE Advisor's responsibilities include:

- Provide HSE advice to the Company's Team and Contractor Teams on-site.
- Actively promote a HSE culture that mitigates the risk of injury to personnel and damage to plant, equipment, environment and heritage aspects of the Project.
- Operate in accordance with the HSE Management Plan.
- Provide clear communication of HSE bulletins and all safety, health and environmental issues.
- Coordinate HSE activities including the Company's, Contractor's and other organisations providing services on site to the Project.
- Maintain HSE records on site in accordance with Project and statutory requirements.
- Participate in and review incident investigations as directed by the Company's HSE Manager.
- Monitor health, safety and environmental programmes as required.
- Submit monthly reports and statistical information to the Company's HSE Manager for review and approval.
- Attend Project HSE meetings, as requested.
- Attend Contractors on-site kick-off meetings and Contractors weekly progress meetings, as requested.
- Attend Contractors pre-start and toolbox meetings as the Company's representative.
- Participate in HSE audits and inspections in accordance with the HSE Responsibility Checklist at Appendix B, and interact with personnel and organisations concerning the improvement of safe work practices on site as required by the Company's HSE Manager.

## 8.7 Contractor Site Managers (All Contractors)

Consistent with statutory and contractual obligations, Contractors are responsible for implementing the following, which will be monitored regularly by the relevant Contractor's Site Manager and/or appointed representative:

- Actively engage in all HSE matters and champion the implementation of this HSE Plan and that of their individual Company.
- Actively promote a HSE culture that mitigates the risk of injury to personnel and damage to plant, equipment, environment and heritage aspects of the Project.
- Conduct formal HSE Risk Assessments and hazard evaluations for all major work activities, and for mobile and fixed plant.

- Confirm risk controls resulting from Risk Assessments are implemented and monitored for effectiveness.
- Appoint competent persons to assist with the effective management of the objectives of this HSE Plan.
- Develop and submit for review their companies project specific HSE Plan and associated procedures, checklists, forms, JHAs, etc.
- Commit to their HSE Plan and monitor implementation of their HSE system on the Project, in compliance with the Project HSE Plan.
- Provide a healthy and safe working environment and maintain adequate workplace amenities for their personnel.
- Attend site kick-off meetings, safety meetings, toolbox, pre-start and other meetings held by their company in the interest of managing safety, and health and environment aspects related to their Contract Works.
- Confirm new employees / visitor's attendance at induction and training sessions.
- Prior to work each day or commencement of a shift, a pre-start meeting is conducted and recorded with all those involved.
- Regularly inspect all plant, tools and equipment to confirm they are free of defects and have current tagging and statutory certification as required and supply documentary evidence of all tagging and inspections to the Company's requirements.
- Share with their employees (team members) information of hazards in their particular work activity. Identify specific hazards with team members as they develop during the construction work. Establish measures to eliminate, isolate or minimise exposure to such hazards.
- Conduct and document daily and weekly inspections of their company work areas to monitor compliance with HSE standards, to identify hazards and then take appropriate action to correct those hazards and supply documentary evidence of all inspections to the Company's requirements.
- Appoint a full time qualified competent HSE resource, approved by the Company for every 30 personnel employed. Where the Contractor employs more than more than 90 employees they are to provide a full time HSE Manager, in addition to the provision of HSE resources. Contractors with minimal personnel, e.g. less than 10 people may appoint a part-time trained HSE resource at the discretion of the Company (approval in writing from the Company).

  For example:

  - <10 = One part-time or full time HSE resource (with approval from the Company)
  - 11 - 30 = One HSE resource

- 31 – 60 = Two HSE resources
- 61 – 90 = Three HSE resources
- 91 - 120 = Three HSE resources and a HSE Manager
- 121 - 150 = Four HSE resources and a HSE Manager

- The suitability of the Contractor's proposed HSE resources will be reviewed and approved by the Company's HSE Manager or delegate during the pre-mobilisation phase and prior to mobilisation.
- Jointly conduct incident investigations with the Company's representatives as required, to identify causal factors and to implement preventative and corrective actions to mitigate any residual risk to as low as reasonably practicable.
- Provide copies of incident investigation reports within 24 hours of any occurrence and other HSE documentation to the Company's HSE Manager as requested by the Company throughout the Project.
- Submit weekly HSE manning and statistical reports to the Company's HSE Manager.
- Maintain current copies of applicable HSE codes and standards as required within their scope of works.
- Comply with Project training and medical requirements.
- Provide and maintain adequate first aid facilities and confirm persons trained in first aid are available for treatment and assessment of injured.
- Comply with the Project Fitness for Work Policy and procedural requirements.
- Provide adequate resources to meet the objectives of the Company and Contractor HSE Plan, so that the welfare, health and safety of their employees are achieved and are not compromised in any way.
- Allow the Company's management representatives free and ready access to all Contractor HSE records in relation to the Project, to audit and assess compliance with them relative to the HSE Plan.
- Confirm all persons under their control are trained and competent to undertake required tasks.

## 8.8 Contractor Supervisors

Contractors' Supervisors are regarded as line management representatives of their respective employer and accordingly share the Due Diligence requirements of management and statutory accountabilities.

Supervisors can have the greatest impact on safety on the Project. Supervisors to lead by example and set the standard for safety in all construction activities. Supervisors are accountable for each of their on-site and statutory responsibilities.

All Supervisors are required to work in conjunction with their Construction Manager and the Company's representatives, responsibilities include:

- Be thoroughly familiar with the HSE Plan and with their individual responsibilities regarding its implementation and enforcement.
- Be directly involved in implementing the HSE Procedures applicable to their areas of responsibility.
- Participate in hazard evaluations and facilitate JHAs as applicable to work activities under their control.
- Take all reasonable action to optimise the environment, safety, and health of each employee under their control. Additionally, Supervisors must emphasise the protection of equipment and property in their area of responsibility.
- Actively promote a HSE culture that mitigates the risk of injury to personnel and damage to plant, equipment, environment and heritage aspects of the Project.
- Facilitate, support and document the toolbox and attend pre-start meetings, and communicate and review the information necessary for employees to work in a safe manner and provide copies to the Contractor's Site Manager on a weekly basis.
- Implement immediate action to correct reported or observed unacceptable environmental, safety, and health conditions and/or behaviours.
- Conduct ongoing assessments of work areas and take necessary corrective actions to eliminate substandard practices, conditions, and/or behaviours.
- Assist in incident investigations and preparation of required reports.
- Enforce HSE related work rules and take action as required to facilitate compliance.
- Comply with the Project Fitness for Work Policy and procedural requirements.
- Evaluate the safety performance of assigned employees / contractors and report findings to their respective Site Manager.
- Confirm all persons under their control are trained and competent to undertake required tasks.

## 8.9 Workers (All)

All site workers acknowledge and are responsible for the following:

- Take reasonable care for their own health and safety.
- Take reasonable care that their acts or omissions do not adversely affect the health and safety of others.
- Comply with all reasonable instructions given by the Company.
- Cooperate with the policies and procedures of the Company.
- Use, care and maintain Personal Protective Equipment issued to them.
- Not carry out any activity that causes or is likely to cause environmental harm, unless relevant permits and/or control measures to prevent or minimise harm are in place.
- Report any incident that may have caused or threatens to cause environmental harm.
- Actively promote a HSE culture that mitigates the risk of injury to themselves and other personnel and damage to plant, equipment, environment and heritage aspects of the Project.
- Report substandard practices, conditions, or behaviours to their Supervisor.
- Promptly report all incidents to their Supervisor, and assist and cooperate with persons conducting incident and hazard investigations.
- Identify and correct hazardous conditions within their area of responsibility if safe to do so.
- Understand if they knowingly jeopardise their own health and safety and/or the health and safety of others, they will be subject to disciplinary action.
- Comply with the Project Injury and Illness Management Procedure in accordance with this HSE Plan and that of their direct employer.
- Comply with the Project Fitness for Work Policy and procedural requirements.
- Comply with all Project HSE requirements and procedures.
- Attend all and actively participate in toolbox and pre-start safety meetings.
- Comply with all security requirements and emergency response procedures.

## 8.10 Visitors

All visitors to the site shall:

- Comply with any relevant site access request requirements.
- Complete inductions as required.
- Sign the Visitor's Register upon entering and leaving the site on a daily basis.
- Follow the instruction of their site escort.

# 9.0 PROJECT HEALTH AND SAFETY MANAGEMENT ELEMENTS

Each of the following sub-sections outlines health and safety elements applicable to the Project. The elements specify the activity to be undertaken, the person responsible for confirming the activity is completed, and when the activity is to be performed. Responsibilities and frequencies for HSE related activities are detailed in the HSE Responsibility Checklist in Appendix B.

## 9.1 Contractor HSE Management

All Contractors will be pre-qualified and assessed in matters relating to HSE prior to award or commencing any proposed works on site. The Company's Project Manager or delegate is accountable for completing and documenting the HSE pre-qualification assessment in accordance with Project pre-qualification requirements.

Contractors will supply all required information in advance of award and during the pre-qualification and process in a timely manner, to allow the Company's Project Manager to accurately assess the HSE performance of the Contractor. Contractors will be assessed by a combination of the documentary evidence provided as part of the tender process and by an audit at the discretion of the Company's representative.

Contractors unable to provide an acceptable HSE Management System but have displayed documentary evidence of acceptable previous HSE performance may be engaged under the Project HSE Management System. This authorisation for this deviation will be approved by the Company's Project Manager and the Company's HSE Manager – HSE Group.

The Company's Project team is responsible for providing the Mobilisation and Start-up Checklist in Appendix A and the HSE Responsibilities Checklist in Appendix B to all potential Contractors with the relevant tender documents.

### 9.1.1 Systems Evaluation

The Contractor will submit an audit and inspection schedule to the Company's HSE Manager. The results of any audits or inspections conducted will be provided to the Company's HSE Manager and Construction Manager.

### 9.1.2 Systems Review

The Contractor will advise the Company's HSE Manager and Construction Manager of any significant changes that are made to its safety and health management systems as a result of any internal or third-party review. The Company's HSE Manager is responsible for reviewing and approving any changes.

## 9.2 Contractor HSE Management Plan (HSEMP)

Contractors will submit a HSEMP for approval prior to commencing mobilisation to the Project. The HSEMP will set a high standard for each major activity of the Contractor to prevent the basic causes of hazards and incidents.

The plan will be developed specifically for the work to be undertaken. Approval to use the Contractor's HSEMP must be obtained from the Company's Project Manager or delegate prior to the contractor mobilising to the Project. The Contractor's HSEMP must meet or exceed the Project standards, the Company's HSEMP, policies and procedures.

The Contractor will provide evidence demonstrating how the HSEMP is to be implemented and maintained throughout the term of the contract. The HSEMP will clearly outline the objectives of the Plan and provide performance measures and targets to enable monitoring of performance.

The Contractor's HSEMP will include, but will not be limited to, comprehensively addressing the following:

- HSE Policy
- Fitness for Work Policy
- Scope of work and any specialist tasks that may require more detailed HSE guidelines or procedures
- WRAC to be created and reviewed throughout the life span of construction
- Plant integrity risk assessment to be prepared prior to fixed and mobile plant being mobilised to site
- Pre-mobilisation inspection of mobile plant, vehicles, plant including generators, welding machines, rigging gear, tools and equipment
- Formal, scheduled maintenance and inspection plan for vehicles and plant that meets Original Manufacturer Requirements (OEM), as a minimum

- Certified inspections for mobile plant and lifting devices and accessories
- Leadership and commitment
- Safety and health culture
- Objectives and planning
- Accountabilities and responsibilities, including an organisational chart
- Legal obligations
- Involvement and communication
- Risk management
- Recruitment and induction process
- Training and verification of competency requirements
- Hazardous materials management
- Mental health and wellbeing / psychosocial hazards management
- PPE Use, care and maintenance, including Glove Matrix
- Hydration and heat illness management
- Lone worker procedure
- Inspections, audits, observations and reporting including details of hazard reporting and responsibility for remediation of non-conformances and corrective actions
- Emergency response plan
- Incident recording and investigation including details of incident investigation and reporting guidelines or procedures
- Workers' Compensation, injury management and rehabilitation policies and procedures
- Performance measurement and reporting
- System evaluation
- System review.

Where the Contractor is unable to implement a suitable HSEMP for the Project, the Contractor should formally apply for permission to operate under this Project HSEMP.

The Company's HSE Manager will liaise with each Contractor prior to mobilisation to confirm compliance with the requirements of the Mobilisation and Start-up Checklist at Appendix A.

## 9.3 Contractor HSE Culture

The Contractor will demonstrate leadership in HSE, and promote and foster a positive and informed workplace culture through:

- Being honest and open about health and safety issues.
- Having annual HSE goals and targets, as well as a longer-term vision for HSE.
- Investing in health and safety (time, money and resources).
- Making health and safety a topic of everyday conversation.
- Setting clear expectations and encouraging accountability.

## 9.4 Subcontractors

The Contractor will provide details of its system for subcontractor pre-qualification, and selection, and managements. The system will address how the management process is used in the selection criteria and confirm the subcontractor's ability to comply with all Site and Project requirements, e.g. eliminating at-risk behaviours and management of hazardous materials and conditions on site.

The Contractor's HSE Management system and processes will apply to all subcontractors, unless prior agreement with the Project Manager and HSE Manager – HSE Group, by submission of approved risk assessment, e.g. logistics trucks drivers.

The Company will pre-approve all Contractor subcontractors prior the Contractor engaging the Subcontractor.

## 9.5 Recruitment, Medicals and Inductions

The Contractor will provide evidence of its system for identifying and documenting the necessary qualifications, licences, competencies and renewal timeframes for all occupations and demonstrate how personnel mobilised to the Project have fulfilled these requirements. This will be in the format of a Training Needs Analysis or other approved format.

Pre-mobilisation requirements must be fulfilled prior to mobilising personnel and equipment to Site. The Contractor will take all reasonable actions to substantiate personnel mobilised to the Project are fit for the roles they are engaged to undertake.

All personnel must complete a Project medical assessment including laboratory drug and alcohol screen prior to requesting induction and a Fit for Work certificate issued by a Doctor must be provided to the Company prior to requesting induction and approval by the Company's Construction Manager or their delegate

The site induction program lead by the Company is to be successfully completed by all Project personnel before the commencement of work. The Company may include job or task specific training to address construction related procedures and standards.

The Contractor will provide evidence that their workers have completed the Contractor's induction, which will include HSE procedures and security protocols which apply to the site as a minimum.

### 9.5.1 Site Access Requests

All visitors and workers must complete and submit the Project Travel Notification Form (insert doc ID when known) at least two weeks' ahead of operational deployment (current visa holders) or one month before intended arrival in-country (current visa not held).

The Contractor must submit site access requests including the following information for all proposed personnel (including subcontractors) to the Company's HSE Manager, at least one month before site access is required:

- Worker Names
- Access Request
- Verification of Competency
- Medical 'Fit for Work' certificate issued within the last three months
- Proof of a negative laboratory drug and alcohol screen
- Copies of all certificates and trade papers, as required by the Company's Construction Manager.

### 9.5.2 Visitor Inductions

Short term visitor inductions are available for personnel attending site for a period not exceeding five days, with the approval of the Company's Construction Manager and completion of Visitor Induction form BRM-FRM-017.

No visitor may access the site unless they have successfully completed the visitor's induction process, all visitors will be escorted by a fully inducted person. All inductions are to be recorded and the records retained by the Company's HSE team for audit purposes.

A short-term induction may, at the discretion of the Company's Construction Manager or delegate, be granted to personnel required to enter site for the purpose of conducting minor works on behalf of the Client, Company or Contractor. This induction is valid for a period not exceeding five days. The visitor

must be escorted at all times and any proposed works must be submitted in the form of a SWMS or JHA before work may commence. Personnel visiting site for the third time in 12 months will be required to complete the Project General Site Induction.

### 9.5.3 Training and Competency

Prior to the commencement of work on Site, the Contractor will provide evidence to the Company, in the form of a training matrix or other approved format. This evidence will clearly demonstrate that its workers, including subcontractors, have the required competency and have completed appropriate training to develop the skills required to enable them to comply with the Project's HSEMS.

A person must not operate any equipment or perform any task, for which they have not been trained, or do not have an appropriate certification and or license to operate / perform. Workers participating in training will be directly supervised by the competent person who is authorised to conduct training which may include third party external training providers. The Contractor will provide all workers with adequate training, information and instruction to safely complete all tasks they are required to perform.

The Contractor will provide evidence of the following:

- Contractor's appointed Trainer and Assessor's recognised training and assessment qualification.
- Personnel are assessed against a recognised competency standard.

Contractors will provide and maintain a Training Matrix which identifies all training / VOC undertaken by each worker. Records supporting the Training Matrix including licenses, certificates, assessment records etc must be maintained and available on site for review by the Company.

The Contractor will provide, as a minimum, the following training:

- Safe work procedures (e.g. SWMS, SWI's)
- Risk assessment - team based and individual risk assessments e.g. JHA, Field Level Risk Assessments
- Task specific training
- Correct use, care and maintenance of PPE
- Occupational health hazards
- Contractor induction package
- Basic fire-fighting within two weeks of mobilisation
- First aid - minimum ratio of 1:25 first aid trained personnel to workers

  - Note, all electrical workers including trades assistants must possess current first aid and resuscitation competencies

- Hazardous materials management including environmental spill management training and Safety Data Sheet awareness
- High risk work (e.g. Working at Height, Confined Space, Isolations).

Verification of Competency is required for all mobile plant and equipment and high risk work activities.

Registered certifications are required for:

- Tradespersons
- Scaffolders
- Crane Operators
- Forklift / Telehandler Operators
- MWP Operators
- Riggers
- Doggers.

Registered certifications should be from a recognised / accredited body or authority approved by the Company.

The Company will provide training for:

- Site induction – (including environmental aspects)
- Visitor and short term inductions
- Isolation
- Permit to Work.

The Contractor should make allowance for other training as required by the Company, i.e. cultural awareness.

## 9.6 Communication and Consultation

HSE Communication and Reporting BRM-PRC-044 documents the requirements for effective communication and consultation.

The Contractor will communicate and promote HSE information via noticeboards, pre-shift instruction (PSI) meetings, weekly toolbox meetings and any other ad hoc meetings to all workers. The Contractor is required to establish a process that will involve worker participation in the identification, control and/or elimination of hazards through observations and inspections.

### 9.6.1 Pre-Shift Instruction (PSI) Meetings

All workers will attend a daily pre-shift instruction meeting with their Supervisor. A pre-shift instruction meeting record including meeting attendance will be documented on Pre-Shift Meeting Record BRM-FRM-019 and maintained as a record by the Contractor's Site Manager for audit purposes.

As a minimum, the meetings should discuss the following:

- Client pre-shift information
- Any incidents or injuries from the previous shift
- Feedback on issues raised previously
- Major activities for the day and possible hazards
- Review of JHAs before the start of work
- Internal or external safety notices
- Outline the work task requirements
- Safety matters relevant to the tasks
- Relevant safe work procedures
- Heavy lifts and material movements
- Behavioural observations
- Interface with other Contractors
- Permit requirements
- Notifications of Energisation and commissioning activities.

The Company's representatives will attend PSI meetings on a rotational basis to provide input and encourage HSE communication.

### 9.6.2 Toolbox Meetings

Contractors will conduct weekly toolbox meetings, either in the form of a general workforce meeting or separate workplace meetings facilitated by the work group's immediate supervisor. The meeting will include all Contractor and Subcontractor employees.

Unscheduled toolbox meetings may occur from time to time as directed by the Company following a lost time incident, significant incident, significant near miss or as directed by the Company's Construction Manager.

A toolbox meeting record including toolbox attendance will be documented on Weekly Toolbox Meeting template BRM-FRM-020 and maintained as a record by the Contractor's Site Manager for audit purposes. A copy will be forwarded to the Company's HSE Manager and maintained on Project Wise.

Toolbox meetings will be attended by the following:

- All Contractor workers, including HSE resources and Contractor management.
- The Company's HSE Manager will attend at least one Contractor toolbox meeting per week.
- The Company's relevant Supervisor.

The following items will form the basis of the agenda for toolbox meetings:

- A safety topic pertinent to the Contractor, work group or risks likely to be encountered (e.g. manual handling) which may be supplied by the Company's HSE Manager.
- Follow up items from previous meetings.
- A review of incidents since the last meeting.
- Items of general health and safety relevant to the Project.
- Items of general health and safety interest to the work group.

Review of relevant JHA(s), where appropriate.

The following items are suggested for inclusion on the agenda:

- Review of the overall safety performance to date
- Contractor's site specific health and safety related issues
- Safety Data Sheet requirements
- Previous internal / external incidents to be recalled for discussion of learnings
- General site related issues

- Overview of forthcoming work and related requirements
- Heavy lifts and material movements.

The Contractor's Management are to actively encourage personnel to raise, discuss, and resolve where possible, any issues or improvement ideas which are related to their work area. Any unresolved issues will be raised with the Company's HSE Manager for management in accordance with HSE Issue Resolution BRM-PRC-006.

The Contractor's Site Manager is responsible for recording, authorising and distributing the toolbox meeting minutes / report. These minutes will be recorded in the Company's Weekly Toolbox Meeting form BRM-FRM-020, or in a format acceptable to the Company, and include an attendance record sheet containing the signatures of all attendees and will be distributed to Company, Contractor and Subcontractor representatives.

### 9.6.3 Weekly HSE Meetings

Weekly HSE Meetings will be chaired by the Company's HSE Manager with participation by Contractor HSE Advisors and Managers.

Minutes will be recorded for each meeting using the Weekly HSE Meeting Minutes BRM-FRM-176. Participants will be required to sign as having attended. Copies of minutes will be distributed to each participant and Contractor Site Manager and will be maintained on the Project database by the Company's HSE Manager.

### 9.6.4 HSE Issue Resolution

HSE Issue Resolution BRM-PRC-006 provides the minimum standard required for the resolution of HSE issues. The Project HSE Issue Resolution Flowchart in Appendix 2 of the procedure shall be followed.

### 9.6.5 Right to Cease Unsafe Work

A worker may cease, or refuse to carry out work if the worker has reasonable belief that the work would expose the worker or any other person to a serious risk to their health and safety from an immediate or imminent exposure to a hazard.

Where the right to cease unsafe work has been exercised, the matter will be managed in accordance with the HSE Issue Resolution BRM-PRC-006.

## 9.7 Leadership and Commitment

Leadership and Commitment BRM-PRC-047 establishes high-level protocols by which the Company's senior management will demonstrate leadership and commitment to the Company's HSE policies and

standards, and the Company's commitment to the prevention of work-related injury and illness and the provision of safe and healthy places of work.

Every Manager and Supervisor working on the Project will confirm that their leadership conforms to the values stated in the Project's HSEC Policy Statement.

Demonstration of this leadership will come in the form of the following:

- Safety being the first agenda item at every meeting.
- Management attendance at site based toolbox and HSE meetings.
- Demonstrating positive and proactive behaviours at all times.

Every Manager and Supervisor will comply with the formal inspection requirements detailed in the HSE Responsibility Checklist in Appendix B.

To provide Supervisors with the tools to effectively lead and manage their team the Contractor will provide orientation to all supervisors. The orientation will contain but not be limited to the following:

- Safety Program: The Contractor will confirm that each of its supervisors is familiar with the conditions of the Site and complies with all Site and statutory requirements.
- Safe Work Areas: The Contractor will confirm that each supervisor conducts a pre-shift inspection of all areas under their control. Each supervisor must be familiar with all areas under their responsibility and correct or have corrected any items that may adversely affect the safety or health of a worker, visitor or the environment.
- Safe Work Practices: The Contractor will confirm that each supervisor informs the crew or work group of the safe practices, work methods, and personal protective equipment required for each task they are assigned to do. Each supervisor will be responsible for determining that each worker has the proper personal protective equipment and tools to do the job.
- Supervising for Safety: When planning and following the progress of the work assigned, the Contractor's supervisor will constantly verify the safe practices and procedures of the crew.
- Toolbox Meetings: The Contractor will task each of its supervisors to attend a weekly group safety meeting with all workers. Meeting minutes will be recorded and will include the topics and attendance. Records of all safety meetings must be maintained and available for review.
- Emergency Procedures: The Contractor will familiarise all its supervisors with the Site emergency procedures and other procedures developed for the Project so that they may provide the leadership required to handle serious injuries, fire, evacuations and similar situations.
- Incident Reporting: The Contractor will take all reasonable actions to confirm its workers report all incidents and near misses, no matter how minor.

- Incident Investigations: The Contractor will confirm its supervisors are required to investigate all near misses and incidents which result in harm to people, damage to equipment, harm to the environment, or loss to process.

- Fire Protection and Prevention: The Contractor will require each supervisor to understand, comply and enforce the requirements of the fire protection and evacuation plan. The Contractor will verify that supervisors follow and enforce the requirements of Hot Work Permits.

The following will be provided, in addition to the previously stated HSEMP requirements, by the Contractor to demonstrate leadership and commitment in health, safety and environment:

- Name and details of the Contractor's most senior Operations / General Manager and their HSE responsibilities.

- Name and details of the Contractor's Corporate HSE Manager and their HSE responsibilities.

- Details of resources to be provided to meet the Contractor's HSE obligations at this site.

- Organisational chart with the name of all key Site management staff, as applicable:

  - Site Manager

  - Supervisors

  - HSE Advisor(s) and HSE Manager where applicable

  - Emergency response delegate

  - First aid personnel

  - List of names and phone numbers for Contractor personnel for notification in the case of an emergency (e.g. incident notification call tree)

  - Copies of the Contractor's safe work procedures applicable to the intended work

  - Risk assessment identifying perceived hazards and identified controls to minimise the risk potential

  - Details of the Contractor's HSE activity schedule including inspections, audits, communications process / meetings and training.

A presentation of the Contractors HSEMP will be delivered by the Contractor at construction kick off to the Company's Project management team.

## 9.8 Risk and Hazard Management

The Project will implement a risk management process that throughout the life of the project initiates reviews and gateway assessments to assist with the identification of potential risks and hazards.

Hazards and risks must be identified, assessed and controlled in accordance with Risk Management Procedure BRM-PRC-009.

### 9.8.1 Consolidated Risk Register

Each contractor will prepare and maintain a Consolidated Risk Register using the Company's Consolidated Risk Register BRM-FRM-133, which will include at least the following elements:

- A description of the risk
- The likelihood and consequence
- Physical, system and behavioural controls
- Residual risk after implementation of control measures
- Final risk score
- Priority for control of the risk based on risk rating.

For significant risks, the register will also document:

- The proposed methods of control for the risk
- The person responsible / accountable for the control of the risk
- The due date for control measures to be completed or reviewed.

As the Project progresses the Company's Project Manager will update the Project Consolidated Risk Register (add doc number).

### 9.8.2 Workplace Risk Assessment and Controls (WRAC)

The WRAC process is intended to identify construction related risks / hazards and how they will be eliminated or managed. WRACs will generally be undertaken by the Company during the construction phase of the Project as follows:

- Pre site mobilisation
- Pre contractor mobilisation for the earthworks scope
- Pre contractor mobilisation of the civil works scope

- Pre contractor mobilisation for structural, mechanical and piping scope
- Pre contractor mobilisation for electrical and instrumentation scope

Each Contractor is required to attend a formal WRAC study review to be conducted prior to the commencement of mobilisation to the Project site. The review team will include the Company's construction and HSE representatives, and the Contractor's senior management and HSE representatives.

The Company's Project Manager is responsible for approving Contractor WRACs and incorporating a copy of the approved WRAC within ProjectWise. Risks identified within WRACs are to be transferred to the Project Consolidated Risk Register.

WRACS are to utilise General Risk Management Rating Matrix BRM-REF-014 to determine risk rating values.

### 9.8.3 Phased Process

A number of reviews occur during the Project Start-Up / Detailed Design phase, including HAZID / HAZOP, design reviews and gateway reviews. The Project Consolidated Risk Register (add doc number) will be updated progressively.

During the Construction phases, the tools and processes used to identify, assess and manage risks and hazards include WRACs which will occur as outlined above, gateway reviews, pre-start and toolbox meetings, safe work procedures, team based and individual risk assessment tools, job hazard analysis (JHA) and permit to work.

The Commissioning phase includes additional gateway reviews, tools and processes to address the new risks and hazards that the introduction of services (power, air, etc) and production materials that commissioning entails.

### 9.8.4 Rules and Safe Work Procedures

All personnel will comply with the site-specific rules and processes. The Contractor will develop safe work procedures, to a standard acceptable to the Company's Construction Manager in compliance with the requirements of the Company's Procedures and processes, for all of its work activities excluding high risk work activities, which will require a Safe Work Method Statement. Safe work procedures will be revised whenever there is a significant change to that work activity or as directed by the Company or as required as a result of an incident investigation or audit finding.

### 9.8.5 Safe Work Method Statement (SWMS)

Safe Work Method Statement Guideline BRM-GUI-019 provides guidance on the effective development and use of Safe Work Method Statements (SWMS).

A SWMS is required for all high-risk construction work activities. A SWMS is a written document that details step by step how a task is to be carried out, the hazards and risks arising from these activities and the measures to be put in place to control the risks. Its primary purpose is to assist supervisors and

workers to implement and monitor the control measures established at the workplace to ensure high risk construction work is carried out safely.

Contractors will prepare and provide SWMS to the Company's Construction Manager for review and approval, prior to work commencing, and will update documents as required. The contractor may use Safe Work Method Statement BRM-FRM-202. If the contractor intends to use its own format the contractor will provide the template to the Company's HSE Manager for approval.

Approved SWMS must be captured in the Project's SWMS Register (add doc number), by the Company's HSE Manager.

The following is a list of construction activities that require the preparation of a SWMS:

- Electrical work
- Energy isolation and work on or near energised plant
- Work near rotating equipment
- Confined space entry
- Work at height
- Tyre handling
- Cranes and lifting operations
- Vehicle / pedestrian interaction
- Light and heavy vehicle interaction
- Work involving powered mobile plant
- Work carried out in or near a trench or shaft with an excavated depth greater than 1.5 meters
- Earthmoving and materials handling
- Work on or near pressurised piping
- Concrete pumping
- Work on, in or near water or other liquid
- Scaffolds – design, erection, use, maintenance and dismantling
- Work on or near chemical, fuel or refrigerant lines
- Work in an area that may have a contaminated or flammable atmosphere

- Work involving tilt up or precast concrete
- Work carried out near any movement of powered mobile plant, on or adjacent to a railway or other traffic corridor that is in use by traffic other than pedestrians.

### 9.8.6 Job Hazard Analysis

A JHA must be completed for all activities or where there is a reasonable probability of an incident occurring if the work process is not assessed and appropriate controls implemented. When a task is not covered by a SWMS, a JHA will be used.

A JHA is required for all tasks where a SWMS or other safe work procedure does not apply.

The JHA will be prepared by the Contractor involving all personnel participating in the work. Generic JHAs are not acceptable and no construction activity will commence until JHA briefings have been completed. All JHAs are to be typed or handwritten at the discretion of the Company's HSE Manager and will be rewritten on a weekly basis to verify currency. Where the task, location and hazards remain the same, the JHA may be extended at the discretion of the Company's HSE Manager for up to a month. The JHA will be written in the language used by the crew.

All JHAs are subject to a review process, which will be coordinated by the Contractor's Supervisor.

The effectiveness of the job hazard analysis process will be assessed by the Contractor and the Company through the compliance audit process. The Company may initiate a JHA / Take 5 Field Inspection BRM-FRM-159 at any time.

As a minimum, a JHA will be completed for the following tasks:

- Works which require a permit, i.e. grid mesh removal, confined space, hot work
- Hazardous substance use
- Use of radioactive sources
- Welding, grinding or flame cutting
- Working at heights
- Work involving compressed air
- Sand blasting and spray painting
- Truck loading and unloading
- Multi-disciplinary team activities
- New or non-routine construction activity

- Manual handling
- Works conducted in close proximity to the general public.

### 9.8.7 Task and Behavioural Observations

The Contractor will complete task and behavioural observations in relation to their workers, and maintain copies of these as an auditable record. The observation process provides for:

- Identification of both positive and sub-standard acts in the workplace.
- Communication and on-scene coaching and reinforcement of expected behaviours.
- A platform to provide direct feedback, both positive and negative, to person(s) being observed.
- Analysis of gaps arising between the observed behaviour and the desired behaviour, and the actions that should be considered to close those gaps.

The Company will complete observations using Behavioural Observation BRM-FRM-092. Completed observations will be maintained on file by the Company's HSE Manager in ProjectWise.

### 9.8.8 Reko 5

The Reko 5 is a hazard identification and risk assessment tool for workers to review the workplace, system of work and work environment prior to starting a task. Where a hazard identified within a Reko 5 is rated as High, a JHA will then be required. The Contractor will maintain copies of completed Reko 5s as an auditable record.

### 9.8.9 Hazard Reporting

Where a hazard is observed and cannot be immediately rectified, the area will be made safe, the hazard communicated to relevant work crews and reported to the Company's HSE Lead. The hazard will be entered into the hazard management section of the Company's incident management system for monitoring and mitigation.

### 9.8.10 Fatal Risk Standards

The Project will implement the Barrick Fatal Risk Standards, which address hazards and critical risk activities which have the potential to lead to serious injuries or fatalities. The Fatal Risk Standards provide mandatory and minimum requirements to manage critical risks including auditable criteria.

Under exceptional and unique circumstances where the implementation of the Project's Fatal Risk Standard cannot be fully achieved, approval for alternative control measures must be obtained by providing a formal risk assessment as described in Approval for Alternative Controls Procedure (insert doc reference when known).

### 9.8.11 Risk Management Training

The Contractor will confirm that all workers (including subcontractors) are trained and competent to identify and assess hazards and perform / participate in individual and team-based risk assessments and will provide documented proof of competency.

## 9.9 Incident Reporting and Investigation

Incident Management and Investigation procedure BRM-PRC-018 procedure details the requirements for the classification, reporting and investigation of incidents on the Project.

All Project personnel and visitors have a responsibility to verbally report any incident or near miss immediately to the responsible Supervisor and HSE Advisor. On becoming aware of an incident, the responsible Supervisor / HSE Advisor will notify the Company's Construction Manager and HSE Manager as soon as practicable.

Significant incidents (Level 3 – 5) shall be notified to the Company's General Manager – Projects verbally at the earliest opportunity by the Company's Project or Construction Manager. The Project will maintain an Incident Notification Call Tree BRM-REF-001 and notifications will occur in accordance with the Call Tree. The Company will report all incidents and near misses to the Client at the earliest opportunity.

The communication of incidents will occur in accordance with HSE Communication and Reporting BRM-PRC-044.

The table below details response times for the various reports and investigations to be notified and completed.

**Table 9.1 Response Times for Reporting and Investigation**

| Category of Incident | Verbal Notification (incl Client) | BRM-FRM-021 HSE Incident Alert | BRM-FRM-002 HSE Incident Investigation Report |
|---|---|---|---|
| Level 1 – FAI, low level enviro impact, minor legal non-compliance, damage <$10,000 | Same shift | Within 12 hours of incident | 3 days |
| Level 2 – MTI/RWI short term enviro impact, low potential impact legal non-compliance, damage 10K – 100K | Same shift | Within 12 hours of incident | 3 days |
| Level 3 - LTI, medium level enviro impact, moderate potential for impact legal non-compliance, damage 100K – 500K | Immediate | Within 12 hours of incident | 5 days |
| Level 4 – Multiple LTIs, severe irreversible damage to a person, high level enviro impact, high potential impact and penalties legal non-compliance, damage 500K – 2M | Immediate | Within 12 hours of incident | 5 days |
| Level 5 – Fatality/s, serious disabling injury to multiple people, major enviro impact, suspended or severely reduced operations legal non-compliance, damage >2M | Immediate | Within 12 hours of incident | 5 days |

Where the duration of the investigative process exceeds that referenced in the table above, the Company's HSE Manager will inform the HSE Manager – HSE Group and with approval from the Construction Manager, advise the Client representative of the intended completion date by email.

### 9.9.1 Classification of Incidents

All incidents are to be classified in accordance with the Incident Management and Investigation BRM-PRC-018, including categorisation as a significant incident or significant near miss where the criteria defined in the procedure is met. All incidents and injuries will be further classified, according to injury / illness severity, mechanism, treatment required and return to work requirements. A determination of work relatedness will also be made in relation to reported injuries or illnesses.

### 9.9.2 Incident Investigation Process

All incidents including near misses are to be verbally reported immediately to the responsible Contractor Supervisor and HSE Advisor. On becoming aware of the incident, the responsible Contractor Supervisor / HSE Advisor will notify the Company's Construction Manager and HSE Manager as soon as practicable. The Company will report all incidents and near misses to the Client at the earliest opportunity.

The initial priority following an incident will be the health and wellbeing of any involved persons and the environment, controlling and making safe the incident scene, post-incident drug and alcohol testing and the above shall take precedence over all else, however the early investigation of incidents (commencing within 24 hours of the incident) is essential.

All Project incident reports will be reviewed by the Company's HSE Manager – HSE Group or delegate, prior to issue. Incident reports will be entered into the Company's electronic incident management system by the Company's corporate HSE team.

Project incidents will be registered in the Company's Project Incident Register (add document number) by the Company's HSE Manager or their delegate.

## 9.10 Emergency Preparation and Response

### 9.10.1 Emergency Preparedness

Emergency Preparedness Procedure BRM-PRC-049 outlines the steps to enable the Project to be responded to in a timely and effective manner. The Company's HSE Manager will coordinate emergency response exercises with the Emergency Response Team and other external emergency organisations to confirm compliance with the emergency response plan. An emergency response exercise must be executed once every six months to confirm that personnel are prepared for emergencies and to evaluate the effectiveness of the response and where required, implement changes to improve the effectiveness of the response.

Contractors will provide coordinated plans to cover all relevant activities on the Project within the Contractors' scope of works. These plans will be prepared in consultation with the Company.

A site visitor register will be maintained by the Company and Contractors.

### 9.10.2 Emergency Response Plan (ERP)

To provide a systematic approach in managing emergency situations or events, a review of the Client's Emergency Preparedness and Response Procedure [insert doc number] and Emergency Response Plan [insert doc number] will be undertaken by the Company's HSE Manager in consultation with the HSE Manager – HSE Group and Site Emergency Response Plan (ERP) 2270-0000-GPLN-004 will be developed in alignment. The ERP is to be approved by the Company's Construction Manager. The Contractor will develop their own ERP in alignment with the Company's ERP. The ERP will clearly define the actions required to manage and control high and extreme risk situations, steps to notify and activate relevant internal and external emergency services (including fire response, police, ambulance, rescue from height and confined space etc) and government agencies.

The ERP will be periodically reviewed and updated at least annually. Emergency procedures will be reviewed following an emergency response drill or actual incidents / emergencies, evidence of the review will be recorded.

### 9.10.3 Emergency Maps

Emergency maps will be posted to a provide information to Project personnel and include as a minimum the location of the following:

- Assembly, muster and exit points
- Medical facilities
- First aid kits
- Fire equipment.

### 9.10.4 Emergency Evacuation Plan

The Company's HSE Manager will review the Client's Site Evacuation Plan [insert doc reference] at the earliest opportunity for the purpose of developing the Company's Site Evacuation Plan in alignment with the Client's processes.

The Company's Project Manager delegate will verify continuous coordination with the Client and CMT in the event of a site evacuation. Emergency evacuation procedures and muster point locations will be communicated during the Company Induction.

### 9.10.5 Emergency Response Personnel

The Project will have an adequate number of personnel with appropriate expertise to respond to emergencies 24 hours a day throughout the Project. The Client's ERT should be trained to skill levels commensurate with the Project risks and hazards and meet local training requirements for the country of operations. The ERP defines the roles and responsibilities of emergency response personnel.

The Project's Emergency Response Team (ERT) and first responders will typically comprise personnel employed by the Client and will be responsible for rescue at height, firefighting and emergency medical treatment.

The Company's site Emergency Management Team (EMT) maintains responsibility for the coordination of response during emergencies and evacuations. Contractors may be required to provide support by agreement between both parties.

Additional support, advice and planning assistance will be provided by the Company's Crisis Management Team (CMT).

A current list of Fire Wardens and First Aid Personnel will be posted on HSE noticeboards on site and retained by the Contractor.

### 9.10.6 Emergency Response Training and Drills

The requirements for Emergency Response Training and Drills will be documented in the ERP. The Project induction will include information regarding the Project's ERP including the following:

- Notification of an emergency
- Site evacuation procedures
- First aid kit use and location
- Emergency telephone numbers and contacts
- Communications equipment use and location
- Radio call signs
- Evacuation areas
- Fire equipment use and location
- Muster points.

The Project's emergency preparedness will be tested every six months and the ERP will be reviewed following an emergency drill to determine the effectiveness.

### 9.10.7 Emergency Equipment

The ERP documents the emergency equipment that will be made available and emergency equipment locations on the site. Equipment will be:

- Complaint with statutory and risk-based requirements
- Fit for purpose

- Available in sufficient quantities
- Inspected, tested and maintained in a serviceable condition, and calibrated where necessary.

Formal records of inspection, testing, maintenance and calibrations will be maintained.

### 9.10.8 Medical Emergency Response Plan (MERP)

The Clients Medical Emergency Response Plan (MERP) 6105A0000-0000-HA05-0001 will apply to all personnel, including visitors, on site. The MERP provides guidance in the event of a medical evacuation requirement to definitive medical care or treatment for severe illness or injury requiring medical attention including dental care which may be locally unavailable or inadequate.

Further information on the MERP is included in the Emergency Response Plan.

## 9.11 Personal Electronic Devices

The use of personal electronic devices, including mobile phones, on site during work hours is restricted to the following persons:

- Manager
- Supervision
- HSE Advisors
- Security, ERT and First Aiders.

The use of mobile phones, including hands free devices, while driving or operating any vehicle or plant is prohibited. Mobile phone calls may only be made or received after parking clear of traffic and placing the vehicle in neutral or 'Park', with the handbrake engaged.

## 9.12 Change Management

HSE Change Management Procedure BRM-PRC-005 provides the minimum standard for a structured HSE related change management program.

Change for the purpose of this section is defined as follows:

- Site procedural changes.
- Changes to facility or infrastructure layout (e.g. roads, traffic flow).
- Equipment modifications.
- Changes to the equipment, goods and services supplied to the Project by Suppliers or Contractors.

- Changes affecting the safety of workers and visitors.
- Changes to local, state or federal government acts, legislation or regulations.
- Works involving new facilities, equipment, materials and processes.
- Works involving modifications of existing facilities, infrastructure layout, equipment and processes outside of initial design specifications.

Sufficient time and resources to assess a change and its impact, identify suitable mitigating controls and effectively communicate change to relevant personnel will be proved by the contractor.

All proposals for change must be documented in accordance with the Company's Change Management Procedure.

# 10.0 OCCUPATIONAL HEALTH, HYGIENE, MONITORING AND WELLBEING

The Company is committed to conducting its operations in a manner that will not cause the health and wellbeing of Project personnel to be put at risk.

The Contractor's HSEMP will demonstrate how the Contractor will address the identification, assessment and the effective control of physical health, chemical, biological, ergonomic and mental health and wellbeing hazards.

## 10.1 Contractor Medical Management

The Contractor will provide a health and welfare monitoring procedure for the management of sick or injured workers both on and off site, which will include as a minimum:

- Protocols for the welfare monitoring of workers who present as ill or injured, to include scheduled, in person monitoring by a competent person.
- Notification to the Company's Construction Manager of individuals who have a serious illness requiring time off work, including status updates for extended sick leave, and their healthy return to work.
- Monitoring and management of prescribed medications to confirm workers have an adequate supply, and are complying with medical guidance. This includes the monitoring of medication documented as required within pre-employment medicals.
- Directives for the safe and accompanied transfer of ill or injured workers to a suitable off-site medical facility, as directed by the Site Clinic Doctor.
- Details of their Workers Compensation Plan for ill or injured workers.
- Communication of these requirements to relevant personnel.
- Medical management.

Medical treatment through the Project clinic is available to all workers during normal working hours for work related illness or injury. All personnel requiring medical treatment are to report to their Supervisor. Clinic Authorisation BRM-FRM-097 form should be completed by the worker and their Supervisor where practicable, and presented at the medical clinic. Where the incident is work related the information will be recorded on the medical register.

The Contractor's management team is responsible for managing any occupational illness, injury or death associated with their company and workers. All medical, compensation and legal matters are to be resolved in a timely and amicable manner.

All non-workplace injuries and illnesses will be the responsibility of the individual and/or Contractor and will not be treated at the Project clinic. Contractors must provide a procedure for the management of ill workers to include medication and monitoring arrangements, transport provisions where necessary including an escort to off-site medical treatment, and notification of illness to the Company's Construction Manager.

## 10.2 Injury Management

The Project is committed to the health and wellbeing of all personnel on site. The Project is committed to assisting workers to return to work as soon as medically appropriate and will adhere to the relevant workers' compensation legislation in the event of a work related injury or illness.

A system for injury management, workers compensation, return to work and rehabilitation will be submitted to the Company's HSE Manager by the Contractor and outlined in the Contractor's HSEMP for approval before the commencement of work. A competent person will be nominated as the Injury Management Coordinator for the Contractor.

The Contractor will maintain a current and valid workers' compensation insurance policy compliant with the relevant in-country legislation at all times during the Project and provide a certificate of currency prior to the commencement of work, and upon request at any other time by the Company.

The Contractor will report all work related injuries, illnesses and incidents to the Company and referred to the Site medical personnel immediately for review and management. Workers will follow the directions given by the Site medical personnel and will return for repeat assessment / review on a daily basis or other required interval as specified by the Site medical personnel until resolution of the injury / illness.

Non-work related injuries or illness sustained by a worker on their rostered break which may impact their fitness for work and ability to perform their duties must be assessed by a suitably qualified doctor and a medical certificate provided to the Contractor for approval to return to work. The Contractor must brief the Company and the Site medical personnel and provide a copy of the medical certificate, with the worker's consent, for approval prior to the worker mobilising to site.

## 10.3 Environmental Heat, Hydration and Heat Illness

In accordance with Health and Medical Management procedure BRM-PRC-003, the Project and Contractor will provide information to Project personnel during induction and toolbox talks to educate and enable personnel to take an active role in prevention and self-monitoring of heat stress.

The contractor's HSEMP will detail their approach to environmental heat, hydration and heat illness management. The Company may require the Contractor to provide a hydration testing method and schedule, and response protocols to be followed for test results that indicate dehydration. The Company may also perform additional hydration testing at their discretion.

Work will be planned to provide for the following:

- Sheltered / cooled rest areas where practicable.
- Ready access to cool potable water.
- Redistributing work in hot areas so that strenuous work is done in the coolest part of the day.
- Use of power tools, lifting aids and other devices to reduce the physical workload in hot areas.
- Barriers against radiant heat.
- Contractors will provide appropriate PPE to workers including long sleeved shirts, trousers, hat brims and sunscreen.

Supervisors are to monitor their teams for signs and symptoms of dehydration and heat illness, workers are to be trained on recognising these signs and symptoms and self-monitor their hydration and health. Suspected heat illness should be reported as early as possible, first aid administered and will then be managed as a medical emergency in accordance with the MERP.

## 10.4 Smoke-Free Environment

In accordance with Health and Medical Management BRM-PRC-003, Project personnel will be protected from the hazards of passive smoking by declaring all indoor work areas that are enclosed or substantially enclosed as smoke-free. This includes but is not limited to buildings, structures, vehicles and accommodation facilities.

For the purposes of this section, the term 'Smoking' includes cigarettes, cigars, e-cigarettes / vapes, pipes and any other smoking implement.

Designated smoking areas will be established, ensuring they:

- are away from areas where dangerous goods, chemicals and gases are used or stored
- are not near where personnel normally work
- are not within 5 metres of an entrance to an enclosed / partially enclosed building or structure
- are not within 10 metres of any ventilation or air-conditioning intakes
- have adequate natural or forced ventilation.

Cigarette butts must be disposed of in approved enclosed smoking disposal units only.

Information on designated smoking area locations will be provided in the Project and Visitor inductions.

## 10.5 Infectious Diseases Management Plan

Infectious Disease Outbreak Management Plan BRM-PLN-006 and Infectious Diseases Management Plan 2270-0000-HPLN-006 provide the structure and protocols required to respond to and manage an infectious disease outbreak that may potentially affect the health of personnel and the Company's operational activities, and protocols that may be enacted on the Project during periods of increased risk in the community.

On award of contract, the Contractor will provide an Infectious Diseases Management Plan which aligns to the Company's plan. Contractor Infectious Diseases Management Plans are required to be approved by the Company's Project Manager and HSE Manager prior to mobilisation to site.

## 10.6 First Aid

Access to first aid facilities, equipment, training, services and trained personnel for the provision of first aid treatment will be available to all Project personnel.

The Company will complete a First Aid Facilities Field Inspection BRM-FRM-154 on a quarterly basis to confirm first aid facilities, kits, equipment and the ratio of trained first aid personnel are compliant with the below sections.

### 10.6.1 First Aid Kit Requirements

First aid kits will be provided by the Company and each contractor, the kits must be appropriate in size and content for the number of people operating in the area and reflect the nature of the injuries likely to occur.

The first aid kits will be located at the Company and Contractor's site offices, and the location of first aid kits will be signposted. Each vehicle on site will also carry a first aid kit. All first aid kit use / treatments will be entered into the first aid kit register and notified to the Company's HSE Manager and the Incident Reporting and Investigation procedure will apply.

Proper stocking levels of all items must be maintained, and checked by the Contractor's HSE Advisor at least monthly. Vehicle first aid kits are to be checked by the driver during the daily pre-start.

### 10.6.2 Trained First Aid Personnel

Each Contractor must maintain a minimum ratio of 1:25 first aid trained personnel to workers, or as agreed by the Company. Where the workgroup is below 25 personnel, at least one qualified first aid trained person must be present on site before the commencement of work. All electrical workers must possess current first aid and resuscitation competencies.

The Contractor will provide a list of names and copies of the certificates of nominated personnel to the Company's HSE Manager prior to mobilisation. A safety helmet label will identify personnel trained in first aid. Each Contractor must as a minimum have one qualified first aid person in attendance whenever and wherever personnel are working.

The Company will also provide personnel trained in first aid, their names along with a photo, will be placed on HSE noticeboards on Site.

## 10.7 Medical Facilities and Medical Personnel

The Client is responsible for the establishment of medical facilities in accordance with site requirements addressing site health and medical risks, and for providing medical personnel. Medical personnel will be suitably qualified according to local legislation and at a minimum be competent in diagnosing, treating and managing common illnesses and medical conditions of the local environment, typical industrial illnesses and injuries as well as pre-hospital trauma and life support.

Contractors shall have access to the Site medical personnel and medical clinic for work-related injuries and illnesses, and for post-incident / for cause drug and alcohol testing as may be required.

## 10.8 Fitness For Work

All Project personnel and visitors have responsibilities in regard to fitness for work, and will comply with the Company's Fitness for Work Policy BRM-REF-002 and requirements of Fitness for Work BRM-PRC-007.

Fitness for work requirements will be communicated to Project personnel and visitors during the induction process. Individuals who are unfit for work will be managed in accordance with section 7.2 of the Company's Fitness for Work procedure.

### 10.8.1 Fitness for Work Policy

The Company's Fitness for Work Policy BRM-REF-002 is provided below.

Lycopodium

## FITNESS FOR WORK POLICY

Lycopodium recognises an individual's ability to perform their role competently and safely, i.e. the person's fitness for work can be compromised by factors including: fatigue, mental health and wellbeing, medical fitness, and alcohol, and/or other drugs. This Fitness for Work Policy details how Lycopodium manages and minimises these risks.

Lycopodium is committed to:

- Providing a safe and healthy workplace in ensuring, so far as is reasonably practicable, that all employees, contractors and visitors are not exposed to the risks associated with fatigue, psychosocial hazards, medical fitness, and the misuse of alcohol, legal or other drugs.
- Creating an environment where all persons recognise the health and safety risks associated with the misuse of alcohol and other drugs, and fostering a culture where it is neither acceptable or legal to come to work impaired by alcohol or other drugs.
- Providing information to employees so that they may better understand the health risks associated with alcohol and/or other drugs.
- Organising working hours and rosters to provide for appropriate work / life balance.
- Encouraging all persons to take responsibility for their own mental health and well-being.
- Providing employees and their families with an easily accessible, confidential and competent employee assistance programs service provider.

This Policy is supported by the BRM-PRC-007 Fitness for Work procedure. This applies to all persons working at or attending a Lycopodium office or site. Employees, contractors and visitors will comply with this Policy and procedure to maintain their capacity to safely perform work.

Management of these factors is a shared responsibility between Lycopodium, its employees, contractors and visitors. Management are responsible for the provision and maintenance of a working environment that is safe and without risk to the health of all individuals.

Without diminishing management obligations, all employees, contractors and visitors have an obligation to take reasonable care of their health and safety, and that of their colleagues and any other person who may be affected by their work activities. They are also required to comply with all reasonable instructions and directions established to provide a healthy and safe work environment.

KARL CICANESE
MANAGING DIRECTOR

August 2022

### 10.8.2 Confidentiality

Sensitive medical and other personal information is safeguarded as required by the Fitness for Work procedure, the Fitness for Work Policy and the Management of Personal Information Policy. Further information is provided in section 6.1 of the Fitness for Work Procedure.

### 10.8.3 Right to Refuse Access

The Company's Construction Manager reserves the right to refuse access or remove from site, any person who reports for work in an unfit state.

### 10.8.4 Alcohol

In accordance with the Fitness for Work BRM-PRC-007, the Project has a zero tolerance of alcohol during work hours while on site. The acceptable breath alcohol concentration (BAC) during work hours is 0.0. Contravention of this standard will be subject to disciplinary action may result permanent exclusion from the Project and revocation of site access.

Project personnel and visitors will be subject to random, post-incident or for cause BAC testing. Testing records will be maintained using Fitness for Work Testing Form BRM-FRM-104.

Contractors are required to administer fitness for work testing as directed by the Company. The Company may train nominated Contractor personnel in the administration of these tests where in country training is not available. The Company may, at the discretion of the Company's Construction Manager, assist with testing where the Contractor is unable to facilitate their own testing.

### 10.8.5 Drugs

The use of any substance (prescription or non-prescription) which results in the potential impairment of performance or impacts on an individual's fitness for work, attendance, or behaviour, constitutes a breach of the Project's Fitness for Work Policy.

The Project has a zero tolerance of illicit drugs on Site. Persons found in the possession or under the influence of, or testing positive to an illicit drug will be subject to disciplinary action may result permanent exclusion from the Project and revocation of site access.

Project personnel and visitors may be subject to random drug testing. All specimen collection and testing procedures will be in accordance with AS/NZS 4308 Procedures for the Collection, Detection and Quantification of Drugs of Abuse in Urine. Where an initial non-negative result occurs, a second confirmatory test will be performed by medical personnel at the site medical clinic.

Any individual who returns a preliminary non-negative test result for any substance that is inconsistent with declared medication will be deemed 'unfit for work' and will not be permitted to work.

An individual who returns a preliminary non-negative test result that could be, or is, consistent with stated / declared medication may be permitted to attend work pending confirmatory analysis, at the discretion of the Company's Construction Manager. An assessment of the medication and any potential side effects will be required and the individual's work may be restricted consistent with the medication.

### 10.8.6 For Cause Drug and Alcohol Testing

For cause testing will be carried out in circumstances as defined by the Fitness for Work procedure, post-incident or upon reasonable suspicion.

### 10.8.7 Refusal and Falsification of Tests

Refusal without legitimate cause to submit to or cooperate fully with the administration of a drug or alcohol test, will result in disciplinary action.

Any attempt to falsify an alcohol or drug test will result in disciplinary action.

### 10.8.8 Fatigue

Fatigue can be associated with or caused by physical exertion, mental exertion, or inadequate or disturbed sleep, the use of prescription or non-prescription medications and medical conditions. Managing fatigue is one of the components of an overall approach to fitness for work.

***Standards for Fatigue Management – Working Hours***

Fitness for Work BRM-PRC-007 defines the following standards which will be applied for all Company controlled work:

- Workers will not work for more than 12 hours continuously unless authorised by the Project Manager or the Construction Manager (or delegate).
- Workers will not work for more than 14 hours continuously unless authorised by the Project Manager or the General Manager - Projects.
- Workers will have a break of at least 10 hours between rostered shifts.
- Workers should not work more than 13 consecutive shifts without a 24 hour break unless assessed and authorised by their Project Manager or the General Manager - Projects.
- Site based fly in fly out rosters will not exceed eight weeks with a minimum 10 day break, unless approved by the Company's Project Manager.

Where, due to operational requirements or other mitigating circumstances, the general standards set out above are not met, the following will apply:

- A risk assessment will be prepared by the Company's Construction Manager to identify the controls that will be implemented to reduce the risk to as low as reasonably practical.
- The risk assessment will be reviewed and approved by the Company's Project Manager and the Company's HSE Manager – HSE Group.

***Identification of Fatigue Issues***

Where fatigue is identified as an issue, it will be managed in accordance with Fitness for Work Procedure BRM-PRC-007.

### 10.8.9 Mental Health and Wellbeing

Company and Contractor HSE resources will develop and promote mental health and wellbeing programs and health promotion materials on site periodically.

Project personnel medicals, including Contractor medicals where practicable when performed in country, will include an acceptable and clinically recognised mental health screening tool to confirm workers are mentally fit for the proposed role, roster and location. Preferably, the Kessler Psychological Distress Scale K10.

Mental health related absences from the Project for a prolonged period will be managed in accordance with the Company or Contractor's Injury and Illness Management procedure and may require a formal mental health fitness for work assessment to confirm fitness for work prior to returning to work on the Project, at the Company's discretion.

## 10.9 Ergonomics and Manual Handling

Contractor Site Managers and Supervisors will confirm that jobs, workplaces, tools and equipment fit the capabilities and experience of those undertaking the tasks. Active supervision and regular job observations will be conducted to detect physical / mental fatigue or musculoskeletal strain in personnel and identify actions to eliminate the causes.

It is the responsibility of the Contractor to identify tasks where there is a risk of musculoskeletal injuries and implement the control measures to be used to reduce the likelihood of any injury occurring. Wherever possible, mechanical lifting aids are to be considered as the first option in moving any load. Where materials can be manually handled by workers, a risk assessment should assess the lift and consider a team lift, considering frequency of the lift, postural constraints, load weight and dimensions, gripping surfaces, distance the load is to be carried, floor surface, environmental factors including obstacles and housekeeping, and communication. At minimum, team lifts will be required for loads exceeding 20 kilograms and should also be utilised for awkward loads.

Contractor safe work procedures and JHA's will identify manual handling hazards and risk control measures as applicable. Contractors will provide manual handling training to all workers and present a toolbox topic and/or wellbeing programs relating to ergonomics and manual handling periodically.

Loading and Unloading BRM-GUI-021 provides guidance on materials handling for loading and unloading activities in respect of manual handling. Workers must not attempt repetitive, frequent or heavy lifting. Mechanical lifting equipment such as trolleys, hydraulic lifts, forklifts, Vehicle Loading Cranes will be made available for tasks where manual handling risks are identified.

## 10.10 Mosquito Management and Mosquito-Borne Diseases

All Project stakeholders are responsible for mosquito management and the prevention of mosquito-borne diseases, including malaria and dengue, on the Project. To achieve effective control of mosquitoes with the least impact on human health and the environment it is important to conduct effective mosquito prevention programs by eliminating breeding habitats where possible or practical to do so, and applying pesticides to control the early life stages of the mosquito.

The Company will request and review Client Mosquito Management Plans, which will include management strategies such as elimination of any standing water that could serve as a breeding site, help reduce the adult mosquito population and the need to apply other pesticides for adult mosquito control. Since no pesticide can be considered 100% safe, pesticide applicators and personnel should always exercise care and follow specified safety precautions during use to reduce risks. Any use of pesticides on the Site must be pre-approved by the Client.

Mosquito Management BRM-GUI-013 provides the minimum standards required to manage the risk of personnel travelling to and working on Projects in countries affected by mosquito-borne diseases.

Without minimising the obligation of the Client or Company, each worker is responsible for personally managing their exposure to mosquitos by following the guidelines provided.

Personal malaria and mosquito-borne diseases prevention programmes are communicated within the Project site induction.

## 10.11 Occupational Health and Hygiene Surveillance / Monitoring

All Project personnel will participate in Client or Company occupational health and hygiene monitoring programs as may be required. Participation assists in verifying controls for occupational exposures are suitable, effective and implemented to reduce exposures to levels as low as reasonably practicable.

Occupational health and hygiene monitoring may include: positional and/or personal air monitoring, noise surveys, personal noise dosimetry, medical examinations, functional assessments (e.g. lung, hearing), biological testing (e.g. blood and urine testing), audits and inspections and worker questionnaires.

In accordance with the Health and Medical Management BRM-PRC-003, contractors will identify and evaluate potential health and safety risk exposures in their areas of responsibility including legal requirements for health surveillance and monitoring, e.g. in response to exposure to atmospheric contaminants, excessive noise or chemicals.

Where necessary to implement a health monitoring program, the Company and contractors will develop a program that meets the requirements specified in the procedure.

Project personnel participation in Client or Company health and wellbeing programs and initiatives (such as group exercise and fitness classes, health and wellbeing information sessions and competitions), is encouraged but not mandatory.

## 10.12 Noise Control / Hearing Conservation

In accordance with the requirements contained Health and Medical Management BRM-PRC-003, the Company and contractors will protect personnel from harmful noise by identifying potential exposures in their areas of operation, and taking measures to mitigate the risk, including but not limited to:

- maintaining equipment in good operating condition
- reducing noise transmission from sources that produce noise in excess of 85 dB(A) by utilising appropriate sound dampening methods and/or altering frequencies and any other effective methods
- providing mandatory signage in areas where noise levels exceed 85 dB(A) requiring hearing protection to be worn in the area
- providing personnel with adequate hearing protection and training in its use, care and maintenance
- complying with Client noise monitoring protocols.

## 10.13 Dust Suppression and Management

Dust Suppression and Management BRM-PRC-022 defines the minimum requirements and equipment to minimise and manage dust emissions.

Dust suppression and management methods which may be required for implementation on the Project include establishing and enforcing site speed limits and traffic controls, regularly inspecting the work site, hauled materials management (e.g. the covering of all loads transported to and from site), stockpile configuration / management, the erection of physical barriers, site access and exit controls, effective management of earth moving activities, soil surface compaction, and keeping land clearance to a minimum.

The Company will prepare a Dust Management Map in accordance with the specific requirements of the procedure (example provided in Appendix A of the procedure) and determine a schedule for dust suppression activities, which will include but is not limited to, applying water spray to all non-bituminised access roads and stockpiled materials. Additional frequencies may be required based on prevailing or forecast climatic conditions (heat and wind).

All complaints relating to dust and air quality must be recorded and responded to, and where relevant, reported to the Client's Environmental Manager.

## 10.14 Workplace Amenities and Food Hygiene

The Contractor must provide adequate facilities for workers, including toilets, drinking water, washing and eating facilities. These facilities must be in good working order, clean, safe and accessible and the facilities will be within a reasonable distance from the work area.

Safe Work Australia's Code of Practice for Managing the Work Environment and Facilities may be referenced as a guide.

**Outdoor Work:** The Contractor must provide access to shelter for eating meals and taking breaks to protect workers from adverse weather conditions, for example, sheds, tents, windbreaks, vehicles or portable shade canopies.

**Drinking Water:** An adequate supply of drinking water must be provided by the Contractor free of charge to workers at all times. The supply of drinking water will be positioned where it can easily be accessed, close to where hot or strenuous work is being undertaken to reduce the likelihood of dehydration and heat illness, separate from ablution facilities and other potential sources of contamination.

The temperature of the drinking water should be at or below 24 degrees Celsius, this may be achieved by refrigerating the water or providing non-contaminated ice or shading water storage containers from the sun.

Water will be supplied in a hygienic manner, e.g. from a supply of disposable or washable drinking containers, so that workers do not drink directly from a shared container. Each worker will be supplied with their own personal drinking container with a lid with at least 1 litre volume and will be responsible for marking it with their name and maintaining the container in a hygienic condition.

**Food Preparation Areas and Hygiene:** In accordance with the guidance in the Company's Health and Medical Management Procedure BRM-PRC-003, Contractor kitchen and food preparation areas on site are to be maintained in a clean and tidy condition. These facilities will include a sink with potable water supply, washing utensils and detergent; an appliance for boiling water; crockery and cutlery and refrigerator.

The Contractor will supply bins with lids, waste must be removed from kitchens and crib rooms on a daily basis to ensure that the facilities do not attract insects and vermin and waste must be disposed of in accordance with the approved waste stream requirements.

**Dining Facilities:** The Contractor will provide workers with a dedicated meals area including tables and chairs and the facilities will be maintained in a hygienic condition, and waste removed at least once a day.

**Housekeeping:** An untidy workplace may result in injuries, such as slips, trips and falls therefore good housekeeping practices are essential. This includes, but is not limited to, spills on floors should be cleaned up immediately, walkways should be kept clear of obstructions, and work materials should be neatly and appropriately stored. Work areas should be made safe and left in a clean and tidy condition at the end of each shift.

**Lighting:** Lighting must be adequate, whether it is from a natural or artificial source, to allow safe movement around the workplace and tasks to be able to be performed safely. The Contractor will perform a lighting risk assessment prior to the commencement of any nightshifts, to determine if additional lighting plant / equipment may be required. The risk assessment will be reviewed and approved by the Company. The Contractor will provide, install and maintain suitable, additional portable lighting.

**Ventilation:** Workplaces must be adequately ventilated. Fresh, clean air should be drawn from the outdoor environment, uncontaminated by discharge from flumes or other outlets and be circulated through the workplace. Indoor workplaces will have natural ventilation, and mechanical ventilation where required such as fans or extraction units or air conditioning. Natural ventilation should allow adequate flow-through or cross ventilation and air quality, including air-changes and fresh air quantities, and should consist of windows and doors that in total are the size of at least 5% of the floor area of the room. Mechanical ventilation and air-conditioning systems will be regularly serviced and maintained in accordance with manufacturer's instructions.

## 10.15 Personal Hygiene Facilities

In accordance with Health and Medical Management BRM-PRC-003, adequate facilities will be provided including the availability of hand washing facilities within ablution areas, and waste disposal. These facilities will be maintained in a hygienic condition and will be subject to regular scheduled inspections in accordance with Site Audit and Inspection Schedule BRM-FRM-084.

Contractors will provide adequate ablution and laundry facilities necessary to confirm a high standard of personal hygiene for personnel in their area of responsibility. The contractor is responsible for ensuring the facilities are cleaned and sanitised at least once a day, suitable waste removal schedules are established and monitored.

In accordance with the guidance in Health and Medical Management BRM-PRC-003, Company and contractor kitchen and food preparation areas on site are to be maintained in a clean and tidy condition, including local chop kitchens and crib rooms (lunchrooms). Waste must be removed from kitchens and crib rooms on a daily basis to ensure that the facilities do not attract insects and vermin, and disposed of in accordance with the approved waste stream requirements.

## 10.16 Sewage and Effluent Management

Sewage and effluent must be managed in accordance with the Sewage and Effluent Management BRM-PRC-025.

Should on-site sewage and effluent treatment be required, treatment facilities will be designed, sized and located to take into account volumes to be treated, disposal of sludge, and the potential to contaminant groundwater.

Treatment facilities will be monitored to ensure they operate within design specifications and discharge limits as per regulatory requirements. Freeboard levels will be maintained within design specifications to minimise the risk of overtopping.

Chemicals will be stored in accordance with Chemical Management BRM-PRC-027 and Bulk Chemical Storage, Handling and Disposal BRM-PRC-026.

Spill response equipment must be provided by the Contractor, positioned works and in contractor laydown areas with the contents inspected regularly. Any effluent or sewage spill will be addressed and reported in accordance with the Incident Management and Investigation BRM-PRC-018. Contractor requirements for facility maintenance, removal and disposal of solid waste / sludge will be assessed regularly. All sewage and effluent treatment facilities will be inspected regularly, including delivery lines,

inlet and outlet point stability, seepage and pond walls as applicable. Records of inspections and preventative or corrective action must be maintained.

Any site-specific licence conditions that relate to monitoring and analysis of treatment plant discharge for designated parameters will be transmitted to the Company by the Client. Reporting to statutory bodies is the responsibility of the Client.

If re-use of treated water is considered on site such as for road watering and revegetation, water quality will be monitored to ensure compliance with any related licence and legislative requirements.

## 11.0 HSE STANDARDS

Contractors will be issued with the Company's standards and guidelines relevant to their scopes via the document control process. a full list of HSE standards is contained on the Company's intranet, available for access by Company personnel.

## 11.1 Personal Protective Equipment (PPE)

PPE Requirements BRM-GUI-011 provides the minimum requirements for the selection, training, use and maintenance of PPE and a Minimum PPE Matrix.

PPE should be considered as the last line of defence where controls of a more effective nature are unsuitable or unable to eliminate the hazard.

The Contractor will supply all personnel including subcontractors with all required PPE including the following:

- safety helmet, suitable for the construction / mining industry
- safety glasses, tinted or clear – rated for medium impact (wrap around or with side shields)
- safety goggles
- face shields
- safety footwear (reinforced or composite safety toes, lace up / zip up above ankle)
- hearing protection, of the appropriate class that provides adequate attenuation and not overprotection to ensure that verbal instructions and other sounds such as audible alarms
- respiratory protection appropriate to the task and airborne contaminants (P2 minimum)
- high visibility long-sleeved shirt with reflective strips; vests are not an acceptable substitute
- long trousers with reflective strips
- high visibility waterproof insulated jackets for extreme cold

- safety helmet winter liners (must comply with International Standard, beanies and hoodies are not permitted to be worn underneath winter liners)
- gloves appropriate to the task being performed
- working at heights equipment (including harnesses, fall arrestors, tool lanyards)
- SPF30+ sunscreen lotion
- any specialised PPE identified as required (e.g. for electrical activities, welding, chemical handling, confined space entry).

All PPE will meet the relevant International Standard and Project standards.

Contractors will provide adequate information, instruction and training in the use of the PPE at Contractor specific inductions, this is to confirm that workers are able to use, care and maintain the equipment to effectively protect themselves from hazards.

Workers and visitors will comply with all site rules, mandatory signage, training, procedural and legislative requirements with regard to the wearing of PPE.

Mandatory PPE safety signage will be displayed as appropriate throughout the site. The only areas exempt from general PPE requirements are:

- inside closed vehicles (windows up)
- offices, ablution and meal areas.

Areas exempt from general PPE requirements will be delineated by signage.

Whenever tasks are risk assessed as requiring double eye protection, including, but not limited to, welding, grinding, cutting, chemical handling, safety glasses or goggles will be worn in conjunction with a full face shield.

Whenever using rotating machinery such as drills or grinders, operators must secure loose fitting clothing to prevent getting caught in equipment. Button up shirts and shirtsleeves or jackets and tuck loose clothing in to avoid entanglement. Long hair must be secured or a hairnet worn.

Personal fall arrest equipment including harnesses and lanyards must undergo annual external inspection and quarterly RGBY inspection by a competent person.

Personal adornments such as necklaces, bracelets, piercings, rings and earrings must be removed during work hours where they are a hazard to the wearer.

The use and condition of PPE will be continually monitored by representatives from the Contractor and the Company, and audited as part of the Audit and Inspection Schedule. A Non-Compliance Warning System is provided in the guideline, Contractors are to adopt these protocols as a minimum requirement.

## 11.2 Permit to Work

Company and Contractor personnel will work directly under the Company's Permit to Work (PTW) system as documented in Permit to Work Procedure BRM-PRC-043.

The Project's PTW system is used to manage the following activities:

- Hot work
- Excavation / penetration
- Isolation
- Confined space entry
- High voltage isolation
- Work in the vicinity of a power line
- Grid mesh installation and removal
- Clearing
- Working at height
- Work box.

In accordance with Permit to Work Procedure BRM-PRC-043 the Company's Construction and HSE Manager are responsible for identifying and authorising suitably experienced Permit Issuers.

The Company's HSE Manager will monitor the PTW system for quality and compliance, maintain records of Authorised Isolators, Permit Issuers, Permit Acceptors and Lock Holders, maintain a Permit and Isolation Register BRM-REG-008 and copies of completed permits for the Project.

The Company's Construction Manager will determine the responsibilities for each permit, and the responsibilities will be documented in an appropriate manner. The table below is provided as an example only.

**Table 11.1 Permit Requirement and Management**

| Activity | Permit Issuer | Permit Acceptor | Permit Register | Audit |
|---|---|---|---|---|
| Hot Work | Company | Contractor | Company | Company |
| Excavation / Penetration | Company | Contractor | Company | Company |
| Isolation | Company | Contractor | Company | Company |
| Confined Space Entry | Company | Contractor | Company | Company |
| HV Isolation | Company | Contractor | Company | Company |
| Work in the Vicinity of a Power Line | Company | Contractor | Company | Company |
| Grid Mesh Installation and Removal | Company | Contractor | Company | Company |
| Clearing | Client | Contractor | Company | Company |
| Working at Height | Company/Contractor | Contractor | Company | Company |
| Work Box | Company | Contractor | Company | Company |

**NOTE: Other permits may be required prior to any work being carried out.**

Prior to conducting any work governed by the PTW system, the Permit Acceptor will complete the permit application and attach all relevant risk assessments, documents and drawings relating to the permit. Once completed, the Permit Acceptor will apply to the Permit Issuer for permit approval. The proposed work activity will not commence until the permit has been authorised. Once approved and issues, the Permit Acceptor will assume overall responsibility for the work activity. A copy of the approved permit and attachments to the permit application must be displayed at the worksite.

The permit is valid for the time specified on the approved permit, or where extended and approved by the Permit Issuer. Excavation permits only can be valid for up to seven days. Where the time initially specified on the permit is insufficient, it is possible to have the permit extended in the same shift, providing the Permit Issuer authorises the extension and remains contactable during the extended period. The extension must be noted on the permit.

A permit will be automatically suspended or cancelled when it expires (if not extended), the Permit Issuer ceases to be contactable on site, the Permit Acceptor ceases to be present on site, any safety controls specified on the permit cease to be effective (e.g. if contact is made with underground services under an excavation permit), permit conditions are violated, gas test results indicate an alarm situation, and in the event of an emergency on the work site or other location.

Activities which typically do not require a PTW include work carried out in a designated maintenance area or workshop where appropriate controls are established, low to moderate risk work activities governed by a JHA and/or safe work procedure, and work carried out to control or prevent the escalation of an emergency.

Contractors are responsible for providing general training to their workers on Permit to Work prior to mobilisation. The Company will provide relevant Project personnel with an induction and training to

allow workers to develop a thorough understanding of hazard controls and authorisations required for the safe completion of a task under the Company's PTW system.

Any incident involving Permit to Work will be reported and investigated in compliance with the Incident Management and Investigation BRM-PRC-018 procedure. Breaches of the Permit to Work Procedure will result in disciplinary action up to and including removal from site.

## 11.3 Cranes and Lifting

Cranes and Lifting Equipment Guideline BRM-GUI-010 provides the minimum standards for the management of crane operations and lifting equipment.

Lifting equipment will be registered with the relevant authority in accordance with the local legislative requirements; copies of machinery certification and registration must be provided to the Company prior to mobilisation to the Project. Each crane arriving on site will be subject to inspection by a Competent Person using the Company's Crane Inspection Checklist BRM-FRM-066. The Contractor is responsible for providing crane operating instructions, detailed maintenance and inspection regimes, based on the manufacturers requirements as a minimum.

The Contractor must provide evidence of a system including a file for each lifting device containing documentation relating to design, manufacture, testing, examinations, repairs and modifications, annual external testing and a notification system which displays the next due date for inspections and overdue inspections.

The six-monthly Crane Inspection Certification by an external provider and daily pre-start inspection records must be carried in the crane cabin at all times. Crane load charts must also be fixed in the crane cabin, where more than one load chart exists, the charts will be kept electronically or in hard copy and readily accessible. A comprehensive pre-start inspection must be completed for each crane utilised each shift, and all faults identified and managed,

All lifting gear must be inspected annually by an external provider. Portable lifting equipment must have a RGBY system tag affixed and must be inspected quarterly by an Advanced Rigger. A Lifting Gear Register, Lifting Gear Certificates and crane maintenance and inspection records must be maintained and readily available for inspection. Worn or damaged lifting equipment must be taken out of service, tagged accordingly, noted in the Lifting Gear Register and either repaired by a suitably qualified external provider or destroyed. Lifting gear must be stored appropriately on a rack.

Only a suitably qualified and competent person will be allowed to operate any crane, use work boxes and operate mobile elevating work platforms. The Contractor must verify the competency of all Crane Operators. The Company may also verify competency using the Crane Practical Assessment BRM-FRM-046. Additionally, no person is to rig or dog a load unless suitably qualified and verified by the Contractor as competent to do so, and all rigging equipment is to be inspected prior to use.

A Crane Lift Study BRM-FRM-052 is required to be completed by the Contractor in advance of all complex lifts. The parameters for complex lifts are defined in the guideline. A Competent Crane Person will be nominated by the Company's Construction Manager and will have the required experience and knowledge in complex lifts to review lift studies. Lift studies will be authorised by the Company prior to

the commencement of lifting operations. Copies of completed lift studies are to be maintained in the Project filing system.

Lift studies are not required for standard lifts. A Lift Plan outlining the key parameters for the lift may be completed by the Contractor prior to the conducting lift, or a task specific JHA that meets the minimum requirements as specified in the procedure.

Before commencing any lift, geotechnical data must be obtained by the Contractor to determine the safe bearing capacity under crane outrigger supports, a soil condition or structural adequacy report will be completed and attached to the Lift Plan or Study where required. When a mobile crane is to be supported on a structure, the Competent Crane Person will check structural adequacy to support the loads and document accordingly.

Where wind speeds are greater than those recommended by the manufacturer, crane operations should be postponed or stopped, and if necessary, the crane should be stowed.

Crane operators are not to leave their position at the controls while a load is suspended. Before leaving the crane unattended, the operator is to land any attached load, including chains, and if applicable, place the pendant control in the off position.

In the event of failure of the crane functions whilst a load is suspended, a barricade is to be installed around the load landing area, so no other person enters that area. The barricade is to remain in place until repairs are complete.

Stationary or mobile cranes are not to be used as a 'come along' to drift loads away from or to a vertical lift position. Where a suspended load on a crane can swing as a result of travel, the load swing is to be controlled by a tag line, 16 mm minimum diameter.

Hard barricades will be placed around the swing radius of cranes and other lifting equipment, when operating in trafficable areas, or where there is any risk of injury or damage to plant and/or equipment exists.

All power operated cranes installed are to be fitted with an emergency hoist stop limit switch. The working load limit (WLL) of each crane and its lifting elements are to be clearly posted. All guards and safety devices are to be in position before the cranes are brought into service.

Cranes, mobile elevating work platforms and other lifting equipment will be inspected daily by the operator and recorded in the plant daily inspection log. All defects or repairs required will be recorded on the log and reported immediately for repairs to be effected. The Company may perform a Crane Field Inspection BRM-FRM-144 at any time during preparation for, or lifting operations.

With any complex lift a documented lifting study will be prepared. Lift studies are to be submitted to the Company, for approval, prior to conducting any complex lift.

The Company defines a complex lift as any lift that meets any of the below criteria:

- 80% or above of any cranes indicated load chart WLL for any given load mass.

- Involving the mobilising of any load mass in excess of 40% of any non-slewing cranes indicated load chart WLL.
- Lifts carried out within 10 metres of overhead high voltage power lines.
- A lift where it is necessary to lift the load over other plant and equipment.
- Using multiple cranes.

Specific requirements in relation to crane operation:

- A Permit to Work must be applied for when lifting is carried out within 10 metres of any overhead high voltage power lines.
- All loads are to have a tag line attached.
- Any deviation from this procedure may only be with the approval of the Company Construction Manager or delegated representative.

### 11.3.1 Work Boxes and Lift Boxes

All work from a work box will be performed in accordance with Cranes and Lifting Equipment BRM-GUI-004.

- No work is to be allowed to be conducted from a personnel cage until a Work Box Permit BRM-FRM-039 has been issued and approved. A separate permit for use is required for each separate occasion.
- Work and lift boxes are subject to quarterly RGBY inspections, and certified annual external inspection by a suitably qualified third party inspector.
- Lift boxes are best described as 'non-fixed load-lifting attachments' as defined in Australian Standard AS 2549 and are intended to lift equipment and/or material loads (not personnel).

## 11.4 Hot Work

Permit to Work Procedure BRM-PRC-043 specifies that hot work typically includes the following:

- Welding
- Soldering
- The use of electrical hand tools and power driven cutters
- Hot riveting
- Burning

- Flame cutting
- Flame heating
- Grinding
- Work involving hot or molten materials.

Unless designated by the Company's HSE Manager, all hot work activities require a Hot Work Permit BRM-FRM-050. A JHA must be developed and attached to the permit for review by the Permit Issuer. Where hot work is to be conducted in a confined space, a Confined Space Entry Permit BRM-FRM-026 is required to be completed and attached to the Hot Work Permit.

Prior to any hot work being conducted in a suspected flammable atmosphere, gas testing must be conducted to confirm the workplace is safe prior to work commencing. Consideration must be given to the disconnection of fire detection / suppression systems as required.

Fire watching is a continuous presence and inspection of the area and its vicinity, fire watchers must not take unauthorised breaks.

Contractors may be subject to a Welding & Hot Work Field Inspection BRM-FRM-167 or BRM-FRM-175 Hot Works – Rubber Lined Equipment Field Inspection at any time during hot work activities.

### 11.4.1 Welding, Grinding and Cutting

Contractors must protect workers so far as is reasonably practical from all hazards relating to welding, grinding and cutting activities including welding fumes, sparks, fire, electric shocks or injury associated with these processes, and verify that the inspection and use of equipment is performed by competent personnel.

Grinders must be fitted with an automatic cut-off function which shuts the tool down once the finger has disengaged from the switch, anti-kickback, or safety clutch, two position anti-vibration handles, safety switch, overload protection and restart protection. Only compatible discs shall be used, and worn discs will be replaced when required.

Contractors will supply workers with appropriate cut resistant gloves which must be used during cutting activities, the cut protection class is to be appropriate to the task.

Contractors will supply workers with appropriate welding gloves and helmets compliant with relevant Australian or International standards for the task. Welding gloves should protect from high temperatures and flames, electric shock, and contact with sharp objects and chemicals, but should also provide protection from accidental contact with heavy or falling objects. Welding gloves will be used on both hands while welding and changing electrodes.

All welders engaged in electric and oxy-acetylene welding will wear appropriate protective shields, welding helmets, eye and respiratory protection in accordance with Australian Standards. Aprons, gauntlets and welding spats will be worn by welders and assistants where there is a risk of injury from

hot slag, spatter or material. All welders and assistants using electric welding equipment will wear insulated footwear.

A documented pre-start check is to be completed daily, prior to operation of machines. Leads and equipment must be inspected for damage. Damaged equipment and leads will not be used and must be tagged out and removed from service for repair or discarded.

Welding and oxy-cutting activities produce fumes that may be harmful to exposed workers and as such must be addressed in the risk assessments and JHA. Consideration must be given to ventilation in the work area and the use of mechanical extraction systems (where available), and personnel in the proximity of the work along with those conducting the activity. PPE should be considered as the least effective method of controlling exposure to welding fumes.

Welding, grinding and cutting in non-designated areas will require a Hot Work Permit. Contractor Supervisors may be authorised, at the discretion of the Company's HSE Manager, to issue Hot Work Permits upon successful completion of relevant training provided by the Company or Project.

The welding earth clamp must be placed on the material to be welded closely adjacent to the weld arc area. Common earth straps between structures are not considered an acceptable means of earthing. Cutting or welding of drums, tanks or containers that have previously contained hazardous and/or flammable material is not permitted.

Welding machines and gas bottles must be turned off whenever the job is complete or unattended. Oxy-acetylene gear and hoses must be inspected before use and all connections kept tight and secure. Gas bottles are to be kept upright at all times. In work areas they will be kept in purpose-built trolleys, cages or racks or tied off to a structural column / member to prevent them from falling.

In-line flash back arresters are required at both the bottle and torch ends of all oxy / acetylene hoses and are to be replaced with new ones annually.

Screens, shields, or other safeguards will be provided for the protection of workers and materials exposed to sparks, slag, falling objects, or the direct rays of the arc.

Cylinders lifted from one elevation to another must only be lifted in racks or containers designed for that purpose. Slings are not to be used to hoist cylinders.

It is the intention that welding machines with the unique electrical hazards they pose, be prevented from providing sustained electrical current to the user due to incident, error, fault or any other situation. It is particularly important that when changing welding rods, that an electrical circuit cannot be created by the user. Therefore, the following points are mandatory:

- Mains powered welding machines will be correctly earthed.
- Any transformer or inverter type welding machine will be fitted with a Voltage Reduction Device (VRD).
- All other types of welding machines will be fitted with an in line isolator or a 'hold to run' type switch.

## 11.5 Fire Control Plan

The Contractor is responsible for providing equipment and training to protect people and plant in the event of fire, within the areas relevant to their scope of work.

As part of the Contractor's HSE Plan the Contractor will submit a Fire Control Plan to the Company, within two weeks of beginning work and prior to engaging in any hot works, which will address the following:

- The handling and storage of flammable materials.
- Containment of flammable liquids.
- Fire protection at storage locations.
- How fires will be handled on the Project.
- Fire watch requirements.
- Hot Work Permits.
- Fire equipment inspection, service and maintenance schedule.

Fire equipment inspection, tagging and servicing will be carried out by a suitably qualified person at the required intervals outlined in AS 1851 Routine Service of Fire Protection Systems and Equipment.

## 11.6 Confined Space Entry

Confined space entry is considered a high risk task. For the safety of all personnel required to work in confined spaces, the Company strictly enforces the requirements of AS2865 Confined Spaces. A confined space is defined within the standard.

Confined Space Entry BRM-GUI-008 provides the minimum standards for controlling risks associated with persons entering, working in, on or near a confined space on the Project. Contractors will provide detailed safe work procedures, suitably trained and competent personnel, and certified and inspected equipment.

All confined spaces on the project will be identified by the Company and registered on the Confined Space Register BRM-REG-020 progressively during construction. Signs will be placed at the entrances to confined spaces.

The contractor must ensure all reasonably practical measures have been taken to eliminate the need to enter or perform work in a confined space. Work must be conducted outside of a confined space where practicable.

### 11.6.1 Entry Permit

The contractor must prepare a Confined Space Entry permit application Confined Space Entry Permit template BRM-FRM-026. Confined Space Entry (CSE) Permits are required prior to any work commencing, and will only be approved by the Company's authorised Permit Issuer. A SWMS, risk assessment and rescue plan must be completed and attached to the permit for evaluation.

The approved Confined Space Entry permit will be prominently displayed at the entry point to a confined space.

The Confined Space Entry permit will only be closed by the Permit Issuer only after that person has:

- confirmed that all persons who entered the space have signed off the permit
- visually checked the confined space to confirm that all personnel are clear and that all equipment and tools have been removed from the confined space
- checked that the work area is clear and that the equipment can safely be returned to service.

Should a non-compliance occur with the requirements of the Confined Space Entry permit, the permit may be cancelled. Where a permit is cancelled, the work may only continue under a new permit, after an incident investigation occurs in relation to the non-compliance with the permit.

No person will enter a confined space on any site unless:

- They have been trained, assessed and deemed competent to do so.
- There is an approved SWMS for the task.
- They have signed off confirming they have read and understood the requirements of the current JHA for the work to be performed.
- There is a current, valid Confined Space Entry permit issued by an authorised person.
- They have signed off confirming that they understand the requirements of the confined space entry permit, either as a stand-by person or an entrant.
- They sign on and off the permit each time they enter and exit the confined space.
- It has been determined that there is either a safe atmosphere inside the space or that adequate control measures are implemented for their safety.
- Where there is more than one entry point to the confined space, the other entry points are sign posted and barricaded in a way that prevents involuntary entry but will allow emergency egress.

***Standby Person***

- A standby person, who has been trained, assessed and deemed competent will be nominated and remains outside the confined space for every confined space entry conducted.
- A worker will have no concurrent duties while acting as a standby person.
- A standby person must be positioned such that they are capable of being in continuous communication with and, where possible, are able to observe those inside a confined space.
- Standby persons may alternate with persons working inside the confined space providing they are properly trained.

***Hazard Identification and Risk Assessment***

- The identification and risk assessment of hazards associated with a confined space will be performed by trained, competent persons in accordance with the Company's Risk Assessment guidelines.
- A generic risk assessment may be appropriate where multiple similar confined spaces are present.
- A task specific risk assessment for the work to be performed on or in a confined space will be performed by all persons involved in the confined space entry work.
- Risk assessments will consider activities where hazards may be exacerbated by a confined space, e.g. hot work, noise.
- In all cases, emergency response personnel must be consulted to assist in developing mandatory emergency rescue plans prior to entry to confined spaces where there is a risk to health and safety, or if there is doubt as to the ability to remove a person from the space in an emergency situation.

***Control Measures***

- The Contractor is responsible for providing equipment and training to protect people in the event of a rescue from confined space, within their individual scope of work area.
- Other permits maybe required to be raised and implemented dependant on the work to be performed, e.g. hot work permit. It may be necessary to use a combination of control measures to eliminate hazards or minimise the risk.

## 11.7 Working at Heights

Safe Working at Heights Guideline BRM-GUI-004 provides the minimum requirements of the Project for the safety of Project personnel that may need to work at height. No workers will work at heights unprotected. At all times, a physical barrier such as scaffold or hand railing will be placed where

practicable as the first means of fall protection. Contractors have an obligation to provide detailed work procedures, certified training for personnel working at heights, and certified equipment inspections.

For any work that has the potential to cause harm as a result of people or equipment falling from one level to another, a suitable means of control must be implemented.

### 11.7.1 Working at Heights Training

The Contractor will provide training to all persons who will be working at height, to the approved Project standard. A Statement of Attainment for Working at Height will be maintained on file by the contractor and made available to the Company upon request for audit purposes.

Approved additional training will be provided to Working at Heights Permit Issuers and workers required to perform specialist tasks including industrial rope access, vertical rescue, pole access and roofing.

Fall restraint system training must be provided by the Contractor. The minimum training requirements are specified in the Working at Heights Guideline BRM-GUI-004.

### 11.7.2 Working at Heights Permit

A Working at Heights Permit BRM-FRM-004 will be prepared by Contractors for work activities to be conducted at any height, or if there is a risk of falling from one level to another. The Working at Heights Permit includes a template for an Emergency Rescue Plan which must be completed by the Contractor in full. A SWMS and JHA / risk assessment conducted by a trained, competent person to identify hazards and implement appropriate control measures must also be attached to the permit application.

The risk assessment must include, but is not limited to, the specific requirements as set out in the Safe Working at Heights BRM-GUI-004.

The below table indicates the Company's minimum required working at height control measures.

**Table 11.2 Working at Height Control Measure Table**

| Priority | Category | Definition | Typical Application | System Description |
|---|---|---|---|---|
| 1 | Restraint Technique – A fall is not possible | A control on a person's movement by means of a combination of a belt or harness, a line and a line anchorage which will physically prevent the person from reaching a position at which there is a risk of a free or limited free fall | Any situation where access to the work can be achieved entirely on a working surface with slope not exceeding 15 degrees and without exposure to a fall | A combination of anchorage placement and fixed length lanyard / line which will not physically Permit the operator to reach a fall-risk position |

| Priority | Category | Definition | Typical Application | System Description |
|---|---|---|---|---|
| 2 | Industrial Rope Access | A system for providing access to a workplace by suspension from a rope where a person is attached to both a working line and a secondary safety line | Any situation where work can be reached by descending or ascending a rope that is anchored above or can be re-directed above the operator | A minimum team of one Level 2 industrial rope access supervisor and one level one industrial rope access operator using ascent and decent devices on one rope whilst attached to a safety line |
| 3 | Restrained Fall | Where the person suffering the fall is partially restrained by a restraining device such as a pole strap, adjustable lanyard or is sliding down a slope on which it is normally possible to walk without the assistance of a handrail or hand line | Working on a pole where no free fall is possible, or on a sloping roof of slope greater than 15 degrees but where secure footing can be maintained without lateral support and from which a substantially vertical fall over an edge cannot occur. Erecting scaffold with inertia reel mounted above job area | A combination of anchorage placement and restraint line or pole strap length, which will permit only a restrained fall on a pole or a sliding, fall on a roof. Use of an adjustable (Type 1 rope grab device) lanyard incorporating a shock absorbing lanyard used in restraint mode |
| 4 | Limited Free Fall | A fall or the arrest of a fall where the fall distance before the fall-arrest system begins to take any loading, does not exceed 600 mm either vertically or on a slope on which it is not possible to walk without the assistance of a handrail or hand line | Any situation where the use of either a short lanyard or a fall-arrest device (or both where applicable) will limit any free fall to 600 mm. | A combination of anchorage placement and lanyard line length, which will permit only a limited free fall (<600 mm). Use of Inertia reel. |
| **Not acceptable on any Lycopodium sites** | | | | |
| NEVER | Free Fall | A fall or the arrest of a fall where the fall distance before the fall-arrest system begins to take any loading is in excess of 600 mm either vertically or on a slope on which it is not possible to walk without the assistance of a handrail or hand line. Must not exceed a fall of 2.0 m | | No user will be exposed to free-fall. The equipment and procedures above will limit any job to a limited free fall as the maximum exposure. |

### 11.7.3 Working at Heights Equipment / PPE

The Contractor must maintain a register of all working at heights equipment / PPE. All working at heights equipment must be certified as fit for purpose before use by a competent person and inspected at intervals not exceeding three months by an Advanced Rigger or other competent person approved by the Company's Construction Manager. These dates, and the due date of the next equipment inspections, must be captured in the register. All damaged equipment must be destroyed to prevent further use and discarded in the appropriate waste bins.

Personal protective equipment must only be considered as a last resort and only if all other control measures are impracticable, unavailable or will introduce further hazards to the work.

Fall Restraint – where other control measures are found impractical and personnel are required to utilise fall prevention or protection devices contractors will provide PPE that allows personnel to work in restraint. Persons are considered to be working in 'restraint' when they are unable to reach an area where a risk of fall to another level exists.

Free fall – fall arrest situations can only be considered if all other control measures have been considered first and proven to be impractical, and only if there is a minimum of 6 metres clearance below the anchor point (or a minimum of 7 metres clearance in the case of securing to a static line). Where these minimum clearances cannot be achieved, alternative fall prevention or fall protection controls will be implemented.

Project personnel will not work at height or use fall protection PPE unless they have been trained in its use, care and maintenance and deemed competent to do so.

The Contractor is responsible for providing rescue at heights capability, in addition to the Client and Company's Emergency Response Teams.

### 11.7.4 Anchor Points

Harness attachment points need to be able to support falling weight and subsequent shock loading without any possibility of failure. It is therefore essential to have substantial attachment points that are in good condition and also have good support at both ends of the horizontal section being used. Suitable horizontal attachment points also depend on the distance between supports at either end.

Anchor point precautions and mobile and fixed plant supporting structure requirements are provided in the guideline.

### 11.7.5 Performing Hot Work at Height

Where performing hot work whilst working at height, contractors will make certain that fall prevention equipment is protected from damage by hot works.

### 11.7.6 Working Below Work at Height

Overhead protection must be provided for personnel working below access ways and active work areas. Barricades and signage must be erected to restrict access, prevent unauthorised entry and inform

personnel. Complete exclusion of a work area or thoroughfare will require the advance permission of the Company's Construction Manager.

Personnel working below another work area must inform the workers above of their presence, and vice versa. If tools and equipment are required to be raised or lowered to the upper work area this will be undertaken by crane or by a rope system with the tools and equipment adequately secured.

## 11.8 Mobile Work Platforms (MWP)

All work at height will be conducted in accordance with Safe Working at Heights BRM-GUI-004. Mobile Work Platform Guideline BRM-GUI-001 provides the minimum standard for the use of mobile work platforms on the project. Mobile work platforms (MWP) include boom lifts, scissor lifts, truck mounted booms and integrated tool carriers.

Contractors have an obligation to provide detailed safe work procedures, trained / certified operators and scheduled maintenance systems for the plant. The MWP will bear an identification (ID) plate including the information as specified in the guideline. MWPs are required to have a formal scheduled maintenance and inspection program with consideration to original equipment manufacturer requirements as a minimum, six monthly certified external inspections and a log book must be maintained with the MWP.

Only certified / competent personnel are to operate or work within an MWP, in accordance with the manufacturer's instructions. Registered certifications are required for MWP operators. Contractors will maintain evidence confirming persons using fall protection equipment have been trained and deemed competent to do so.

A Working at Heights Permit BRM-FRM-004 will be required when work will be conducted involving the use of mobile work platforms (MWP). A JHA must be attached to the permit application. The permit application also includes provision for a rescue plan in the event of an emergency.

Every person in the 'basket' must be restrained with proper fall protection equipment. Contractors will comply with the specific requirements in the guideline in relation to the prevention of falls, anchor points, fall arrest systems, fall restraint devices, falling / dropped objects and tool / equipment restraint.

No person will enter or leave the MWP when elevated, except in an emergency, unless each of the conditions detailed in the guideline are met.

Prior to commencing any work involving an MWP, a pre-start inspection must be undertaken and weather conditions assessed for suitability. If weather hazards including wind / wind gusts, lightning and heavy rain commence during MWP use, the job must be stopped, the basket lowered, the MWP shut down and workers are to proceed to shelter.

- EWPs are to be operated by certified competent persons in accordance with manufacturer's instructions.
- A log book is kept and maintained for all EWPs used on site.
- MWPs are not used for the purposes of transporting materials.

- A person must be designated to control the work platform, scissor lift or man-lift ('the basket'), who is trained and competent to do so.
- Where practical, the designated person should be in the 'basket'.
- Every person in the 'basket' must be secured at all times with proper fall protection equipment.

### 11.8.1 MWP Access and Egress

No person will enter or leave the platform when elevated except in an emergency unless each of the following conditions are met:

- Risk analysis by way of a JHA shows that this alternative means of access is safer than all other alternative means of access and egress.
- The JHA is signed and approved by the Company's HSE Manager.
- The structural adequacy of the landing area has been established, and the landing area is clear.
- Where the landing is at the edge of a structure, the maximum gap between the platform and the landing must not exceed 100 mm, the platform will be secured (e.g. tied) to a suitable point on the landing, and access and egress will not take place unless a safety harness is properly worn and attached at suitable anchor points on both the structure and in the platform via a double lanyard while moving from one to another.
- Where the landing is in an area away from the edge of a structure, the landing point will be not less than 2 m from the edge of the structure, where any potential fall is in excess of 1 m.
- The base controls for the MWP will be tagged to indicate the equipment is in use and to caution against interference.

## 11.9 Work Boxes

Work boxes will be used where Mobile Work Platforms (MWP) and scaffolding is not practicable to access plant or equipment, or when the timeframe involved in accessing the plant or equipment, such as the erection of scaffold, would compromise safety, the environment or production.

Work Box Guideline BRM-GUI-00 provides the minimum standards for managing the risk of lifting people in crane-lifted work boxes including the precautions and safety measures required to prevent injury to personnel and damage to plant and equipment.

Contractors will provide detailing safe work procedures, training / certification for workers and scheduled maintenance systems for their plant. All man cages / work boxes, lifting attachments and suspension slings, overhead protection and crane use must be compliant with the requirements as specified in the guideline.

No work involving the use of a work box can be conducted until a Work Box Permit BRM-FRM-039 is issued and approved. The Work Box Permit BRM-FRM-039 is to be used in conjunction with the Working at Heights BRM-FRM-004 Permit.

Flammable substances, oxy acetylene cylinders and other similar hazardous substances and cylinders must be correctly secured, and only minimum quantities held sufficient to carry out the work. Flammable substances must be carried together with a suitable class fire extinguisher. Where the work requires personnel to exit from a man cage in an elevated position, a comprehensive risk assessment must be conducted taking into account all relevant factors including environmental conditions, integrity / condition of the surface onto which the egress will be made, personal protective equipment, double lanyards 100% tie off, and the proximity of hazardous materials / machinery. The risk assessment must be approved by the responsible manager prior to the work proceeding.

## 11.10 Scaffold

Scaffolding Guideline BRM-GUI-002 provides the minimum standards required on site for scaffolding in order to provide and maintain a safe system of work. Scaffolding equipment and activities will generally comply with the requirements of Safe Work Australia's General Guide for Scaffolds and Scaffolding Work, and Australian Standards AS 1576 Code of Practice for Metal Scaffolding and AS 4576 Guidelines for Scaffolding.

Contractors have an obligation to provide detailed work procedures, trained / certified scaffold workers and inspection systems for scaffolding. The Contractor is responsible for building the scaffold to the manufacturer's specifications and relevant standard, and inspecting the scaffold erection after completion, signing off and attaching the appropriate tag to the scaffold. Scaffolds will be inspected by the Company's Lead HSE Advisor or their delegate as part of the Company's audit / inspection schedule.

Scaffold selection will take into consideration the guidance contained in Section 5.3 of the guideline. The construction, foundations, stability and rigidity of a scaffold must comply with or exceed the guidelines described in the guideline. In all cases, scaffolding must be designed to the specification detailed by a competent person. Specific guidance is provided in relation to trestle scaffold, prefabricated scaffold and mobile scaffold.

Work platforms, edge protection and access / egress arrangements will be compliant with the specific requirements in the guideline.

The erection and dismantling of scaffolds, inspections and scaffold tagging will be in accordance with the guideline.

## 11.11 Fixed Platforms, Walkways, Stairways and Ladders

The Contractor's fixed platforms, walkways, stairways and ladders will conform to Australian Standards AS 1657 Fixed Platforms, Walkways, Stairways and Ladders – Design, Construction and Installation, AS 1892 Portable Metal Ladders and will be inspected quarterly by the Contractor under the RGBY system.

The Contractor will maintain a ladder register, which may be auditable by the Company.

## 11.12 Falling / Dropped Objects

Falling / dropped objects can cause serious injury, structural, environmental, and equipment-related damage. Contractors will have dropped object control measures in place to prevent objects from falling, in addition to controls protecting workers on the ground from dropped objects.. Contractors will be compliant with the guidance in Safe Work Australia's Falling Objects Fact Sheet.

Controls may include, but are not limited to:

- Establishment of exclusion zones
- Tethering of tools, equipment and materials
- Containers for small objects
- Overhead protection fitted mobile plant
- Overhead protection for work occurring below active work areas and pedestrian walkways (e.g. gantry).
- Signage
- Containment sheeting
- Toe boards or infill panels
- Lift boxes
- Catch platforms.

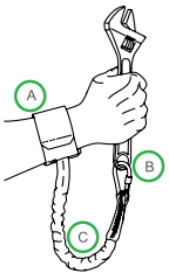
The Company may conduct a Dropped Objects Field Inspection BRM-FRM-147 during relevant activities.

### 11.12.1 Tool and Equipment Tethering and Containers

Contractors should include a risk assessment for all tooling and equipment attached to the Working at Heights permit application when the potential for dropped objects is identified. Tool and equipment restraint will be applied for all tools and equipment for work at heights.

Tool tethering / restraint equipment must be appropriately load rated, third party certified and will not be hand made. As per the below figure, tool lanyards / tethers must include an anchor attachment (A), tool attachment (B) and tether (C).

**Figure 11.1 Tool Lanyard / Tether**




Tool holsters, tool belts, tool pouches, spill control buckets and wristbands may also be suitable additional controls for dropped objects.

## 11.13 Barricades

Barriers and Barricading Guideline BRM-GUI-009 establishes the requirements and minimum standards onsite for barriers and barricading in order to provide and maintain safe working requirements and prevent personnel and plant from entering hazardous areas.

The Contractor is responsible for establishing and maintaining barriers and barricades. They must be constructed, erected and maintained to the satisfaction of the Company's Construction Manager. All barriers will be identified with a sign or information tag, compliant with the information as specified in the . Barriers and Barricading Guideline BRM-GUI-009.

Barriers are used to control or prevent access into and egress from or through a work area identified as hazardous, erected under all exclusion zone areas to prevent entry by unauthorised personnel, prevent equipment and / or personnel from falling, defining areas allocated to short term stowage of goods and materials, and define areas where commissioning and other high risk activities are being performed.

Barriers and barricades will be placed not less than one metre from the hazard, or not less than two metres from an excavation, although if the excavation has a sheer wall the distance should be the same as the depth of the excavation to protect the wall from trafficable pressure at ground level. Barricades are to be a minimum of 900 mm high. Caps must be fitted to all-star pickets or stakes.

Barriers will be inspected by representatives of the Contractor and the Company on daily workplace inspections and in accordance with their audit / inspection schedules.

### 11.13.1 Soft Barricades

Soft barricades are to be erected as temporary warning measures to identify an immediate hazardous location. Soft barricading will consist of line and flag bunting, moveable barricade stanchions, coloured plastic cones (red or orange), and flashing lights.

Where soft barricade is used it should be adequately supported and tensioned to maintain their effect in adverse weather conditions (rain, wind, etc). Steel star pickets are not to be used to support soft barricading on Brownfield sites at any times or on Greenfield sites where underground services are energised.

Soft barricading must be constructed, erected and maintained in compliance with the specifications. in the Barriers and Barricading Guideline BRM-GUI-009.

Note, caution or danger tape must not be used as a soft barricade medium onsite except in emergency situations as a temporary measure until hard barricading is acquired and erected. Traffic cones will be placed across a road or access way to delineate 'No Go Areas'. Hard Barricades

Offer physical resistance to the passage of people or equipment and are to be erected from scaffold tube, timber framing, metal frame panels and either post and ring-lock or chain-mesh fencing.

Hard barricades must be constructed, erected and maintained in compliance with the specifications. in the BRM-GUI-009 Barriers and Barricading Guideline.

### 11.13.2 Bunding and Windrows

The Contractor will establish and maintain bunding and windrows at half the height of the tyres of the largest machine operating within the area. The Contractor must install reflective delineation to earthen bunds if deemed necessary by the Company.

## 11.14 Excavation / Penetration

Excavation Guideline BRM-GUI-018 provides the minimum standards required on site for excavation activities. The guideline should be applied in conjunction with Safe Work Australia's Excavation Work Code of Practice 2018 and Australian Standard AS 5074-2005 Hydraulic shoring and trench lining equipment.

An Excavation / Penetration Permit BRM-FRM-047 must be completed and submitted at least 48 hours in advance of the proposed commencement of work to allow for mechanical and electrical authorisation. The permit application will include a JHA, full details of the proposed excavation/penetration including measurements, 'as built' drawings detailing existing underground services to be excavated or building structure cavities to be penetrated, and a clearing permit (where applicable). The maximum validity of Excavation / Penetration Permits is seven days.

Where necessary, underground services and services within buildings are to be identified using pipe, cable and stud indication instruments in addition to local site knowledge. Buried / enclosed services must be durably marked to indicate their location.

An inspection of the proposed excavation and penetration site by personnel who have specialised knowledge is to be undertaken before Company authorisation of the work activity. Environmental approval must be obtained prior to any excavation where ground disturbance approvals are required.

The Permit Issuer will complete the Excavation / Penetration Permit delineating any special conditions applicable and issue the permit with copies of underground services records marked up to indicate potential hazards.

All excavations will be adequately barricaded, guarded or bermed in accordance with the Barriers and Barricading Guideline BRM-GUI-009.

If an excavation / penetration encounters, damages or strikes unexpected obstacles / services (including service pipes and cables), the job must be stopped immediately and reported to the Surveyor and the Company HSE Manager, who will report to the Company's Construction Manager.

### 11.14.1 Clearing

Contractors responsible for initial excavation / clearing activities must apply for and be in possession of an approved Clearing Permit BRM-FRM-038 before submitting an Excavation Permit for approval prior to the commencement of work. Previously cleared and filled ground does not require a Clearing Permit.

### 11.14.2 Buried Services Records

Where the excavation / penetration is for the installation of any new buried or enclosed services, it is mandatory that full details of the service be shown on records maintained. The Contractor is responsible for the provision of full documentation of the as built installation, to the satisfaction of the Company on completion.

Following installation (and testing) of the service and before back filling or enclosure commences, the Contractor will be requested to make detailed records including for the proposed reinstatement and protection methods used.

### 11.14.3 Backfilling

Prior to the commencement of backfilling, a Backfill Permit BRM-FRM-048 must be obtained. Backfill of the excavation is only to commence once the Surveyor has completed recording the site. The original Excavation / Penetration Permit must remain at the worksite during the backfill activity.

Following the backfilling of the excavation the Backfill Permit is to be attached to the original Excavation / Penetration Permit, and returned to the Permit Issuer along with all related documentation.

## 11.15 Isolation

Activities requiring isolation will comply with the requirements of Isolation Procedure BRM-PRC-050, which defines how people and equipment will be protected from hazardous energy sources during construction and commissioning.

Where personnel are required to work on or near equipment that is live, or has the potential to become live, the equipment must be isolated and locked out from the power source. Hazardous sources that require isolation include but may not be limited to:

- Plant
- Electrical equipment
- Compressed gas or hydraulic systems
- Charged springs

- Heated substances
- Radiation
- Stored gravitational or kinetic energy.

An approved Isolation Permit BRM-FRM-049 is required for all isolations, however an Isolation Permit Exclusion Clause may be enacted from time to time in the event of emergencies or urgent circumstances.

The Company's procedure defines the roles and responsibilities for isolations including the Authorised Isolator, Permit Accepter, Permit Issuer. It also defines isolation types, tag and lock requirements, and the specific protocols to be followed, including missing person protocols. Provisions are also made for third party vendors required on site.

The Company's HSE Manager will maintain a Project Permit and Isolation Register BRM-REG-008 on the Project database, which will include a lock register. Isolation Training

Isolation training will be conducted by a member of the Project HSE team approved by the Company's Construction Manager, for all Supervisors and workers who are involved in working with the Isolations of Systems, equipment or plant that has a stored or direct energy source.

Workers will be required to attend training and be deemed competent before they are permitted to be involved in any process of Isolation. Isolation Written Assessment BRM-FRM-177 may be used to assess competency. Contractors must maintain records of their personnel who have attended training.

All nominated Authorised Isolators will be required to pass the Company's VOC Authorised Isolator Practical Assessment BRM-FRM-178 which will be signed off by the Company's Construction Manager prior to the Authorised Isolator performing any isolations on site.

### 11.15.1 Commissioning

The Company's Project-specific Commissioning Plan outlines the plan for pre-commissioning and commissioning activities and identifies the various stage, responsibilities and methodologies for activities during those stages.

Commissioning training will be conducted by a member of the Project HSE team, approved by the Construction Manager, for all relevant Supervisors and workers.

## 11.16 High Voltage (HV) Isolation

All activities to be carried out on high voltage equipment will comply with the Company's HV Isolation Procedure BRM-PRC-042, this applies to plant and equipment used in construction as well as plant and equipment under construction or commissioning. The procedure will be employed during the construction and commissioning phase of the Project for HV equipment access and isolation of electrical systems.

The Company's Construction Manager will appoint in writing interim Authorised HV Isolators and Authorised HV Checkers associated with early work activities prior to mobilisation of the Commissioning

Manager. Once mobilised, the Commissioning Manager will appoint Authorised HV Isolators and Authorised HV Checkers.

A HV Isolation Permit BRM-FRM-035 is to be used where works require access within the safe working distance of High Voltage Equipment that has the potential to be energised. This includes tasks such as work on overhead power lines, opening HV switchgear covers and accessing terminal boxes of HV motors.

The Notice of Energisation (NOE) process also applies to HV Commissioning.

## 11.17 Grid Mesh Installation and Removal

All grid mesh installation and removal will be completed in accordance with the Company's Installation and Removal of Grid Mesh Guideline BRM-GUI-016, as per the Australian Standard AS1657:2018 Fixed Platforms, Walkways, Stairways and Ladders – Design, Construction and Installation. Due to the high risk associated with the installation and removal of grid mesh, all workers involved in the installation or removal must complete grid mesh training.

A Grid Mesh Installation Checklist BRM-FRM-182 will be completed by the Contractor prior to the commencement of work. A Grid Mesh Post Installation Clearance Checklist BRM-FRM-183 will be completed the Contractor and Company representative post-installation.

A Grid Mesh Removal Permit BRM-FRM-023 is required prior to the commencement of work. A Grid Mesh Removal Field Inspection BRM-FRM-155 must be completed by the Company post-removal.

## 11.18 Loading and Unloading Activities

Loading and Unloading Guideline BRM-GUI-021 provides the minimum standards and responsibilities for activities under the control of the Company. Separation of people and equipment must be at the forefront of any effective loading and unloading system of work. Project personnel engaged in the supply, delivery, handling and unloading of equipment and materials on site are required to comply with the guideline.

All persons responsible for deliveries to the Project site will confirm the transport service provider is familiar with the loading and unloading requirements prescribed in the guideline. The transport service provider must also be familiar with Transport and Shipping Packing Instructions LYCO-GSPC-001.

The Contractor must promptly advise the Company's Project or Construction Manager prior to undertaking any loading or unloading activities where it is deemed impractical, and/or they are unable to wholly comply with the requirements of the guideline.

A SWMS is required for all loading and unloading activities on the Project. The shipping agent must provide the documentation stated in the guideline, and if this documentation is not received, unloading activities are prohibited from commencing until the documentation is provided.

Personnel operating mobile plant / equipment will be fit for work, licenced, trained, competent to complete the work, understand the requirements of the Project and authorised to operate the mobile plant / equipment.

Spotters involved in the loading and unloading team must be trained in the activities defined in the guideline, assessed as competent and authorised to spot equipment.

Designated loading and unloading area(s) will be clearly signposted as restricted work areas to control unauthorised access. A traffic management plan for the area must be developed and consider at minimum the location of call-up and other signage, speed limits, traffic flow and pedestrian walkways. Appropriate plant will be assigned to provide safe access to loads, and adequate lighting must be provided for the safe operation of mobile equipment.

The use of scaffolding to construct stationary and semi-permanent loading docks, access ways and working areas with complete handrails and anchor point systems may be considered for access to trailers where access would otherwise expose personnel to a fall or open edge (refer to Scaffolding section).

Communication via two-way radios used by workers during loading and unloading activities must be restricted to secure frequencies to avoid cross talk. The Contractor will confirm their workers are trained and familiar with the protocols of positive communication as communicated in the guideline.

Additional specific guidance is documented in the procedure in relation to the handling of steel, reinforcing bar and pipe, and HDPE pipe.

## 11.19 Prohibited and Restricted Tools and Equipment

The following tools and equipment are prohibited from use on site, in alignment with the Client's Prohibited and Restricted Tools and Equipment Procedure (6105A0000-0000-HA05-0013):

- Air conditioning flushing canisters
- Extension bars for ratchets and torque wrenches
- Twin tailed fall arrest systems
- Open and fixed blade or other knives where the blade does not self-retract
- Jumper leads
- Manual torque multipliers
- Handheld or portable friction cutting devices such as grinders with grinding wheels / discs of 9 inches or greater
- Grinders **without** automatic shut off switches (dead-man switch)
- Cutting discs of less than 1.6 mm thickness
- Welders without voltage reduction devices (VRD) fitted
- Two post hoists

- Stillson wrenches
- Over centre binder (dog) for load restraint with cheater (extension) bars
- All flammable contact cleaning substances
- All asbestos-containing materials
- Crow bars without cap at one end
- Improvised or hand-made tools
- Hard faced hammers above 2 kg
- Hardened steel drifts (mild steel are acceptable provided the head is dressed).

The following tools and equipment are restricted from use on site and should only be used where necessary and unavoidable by suitably trained workers, in alignment with the Client's Prohibited and Restricted Tools and Equipment Procedure (6105A0000-0000-HA05-0013):

- Explosive power tools; low velocity / indirect tools are recommended
- Belt splicing knives
- 7 inch grinders
- Worm drive clamps on pressurised air and water hoses, double ear or saddle type grooved clamps may be risk assessed as alternatives, bandit tape or punch lock system repairs are acceptable when installed correctly
- Support stands with lower main frames and moveable centre posts; alternatives included adequately rated ratchet type or fixed height support stands.

The Company and Client reserves the right to make further additions and amendments to the lists of prohibited and restricted items as may be required.

## 11.20 Machine Guarding

Guards provide physical or other barriers that can perform several functions including preventing contact with moving parts or controlling access to dangerous areas of plant, screening harmful emissions such as radiation, minimising noise through the application of sound-absorbing materials and preventing ejected parts or cut-offs from striking people. Safe Work Australia's Model Code of Practice for Managing Risks of Plant in the Workplace provides a practical guide on guarding that should be adopted by Contractors.

Electrical, mechanical and pneumatic machinery and equipment will not be allowed on site unless all guards and barricades are in good condition, and secured in the correct position. Equipment and plant will be in good working order and subject to an inspection process to confirm compliance.

If any type of guarding is removed for the purposes of maintenance or cleaning, it must be replaced before the machinery / equipment is put back into normal operation. The item should not be able to restart unless the guarding is in place. When removing guarding, the energy source must be isolated by disconnecting the power supply.

## 11.21 Vehicles, Driving and Licensing

The Company's Light Vehicle Use and Management Guideline BRM-GUI-007 provides the minimum standards for the use and management of light vehicles on the Project. Driving guidance, procedures, driver training and verification of competency are the responsibility of the Contractor.

The criteria for authorisation to operate light vehicles is specified in the guideline. The Site Driving Practical Assessment BRM-FRM-005 must be completed and signed off prior to workers driving on site.

Vehicles must meet the minimum specifications and be fit for purpose on arrival to site, and in good mechanical condition. On mobilisation to site, all vehicles must have a current statutory registration and maintenance records/logbook as evidence of scheduled maintenance.

Vehicles will be inspected upon arrival to site. A third-party Contractor will be responsible for conducting light vehicle inspections, and will provide a suitably qualified and competent person to undertake the inspection using the Company's Light Vehicle Inspection Checklist BRM-FRM-065, a Company Supervisor will attend and witness the inspection. The completed inspection will be reviewed and approval granted as appropriate by the Company's Construction Manager prior to the plant being operated on site.

Personnel will comply with Fitness for Work Procedure BRM-PRC-007 requirements whilst driving a vehicle.

Authorisation is required from the Client to drive a Project vehicle outside the Project boundaries, unless this is required as part of their regular duties, such as the regular driver of the airport bus.

Drivers will comply with the relevant Project traffic rules and protocols including altered site traffic rules including site speed limits whilst operating vehicles on site. Where site traffic rules make no provision, the local traffic legislation will apply.

Drivers will comply with posted speed limits on the Project, and with signage on public roads, formed dirt roads and bush tracks. On areas with no established roads or tracks, drivers will drive to conditions.

Prior to mobilisation the Contractor will present inspection records indicating a vehicle is safe to use on site, refer to Mobilisation and Start-up Checklist, Appendix A.

The following requirements must be met to operate a vehicle on site:

- All vehicles are fit for purpose and carry current registration and insurance.
- All vehicles and plant will display a current Project vehicle sticker (remove bullet point if not required by Client).

- All vehicles will be equipped to meet the Company fleet standard specifications including in vehicle monitoring system, including, fire extinguisher, flashing light, emergency triangles, spare tyre, etc.
- Vehicles required to operate in the mining area will comply with the Clients mine specific requirements.
- All drivers of light vehicles are to complete practical verification of competency.
- All designated drivers are to hold a current driving licence issued by the relevant government authority.
- All vehicles must be turned off when unattended. Emergency vehicles may be excluded. Delivery drivers must remain with vehicles at all times including when unloading and are not to assist except with the releasing of straps and chains.
- Seatbelts will be worn at all times.
- Vehicles are maintained according to the manufacturers' recommendations and their maintenance records are kept.
- Pre-start inspections are carried out on a daily basis unless the vehicle is used solely by the Client; in such a case a pre-start may be conducted weekly.
- The basic site road rules for the Project are covered in the Project induction.

### 11.21.1 Journey Management

To ensure adequate planning is conducted for in-country travel and long distances offsite, all Project personnel will comply with the Client's Journey Management Plan (6105A0000-HA-12-0001). The flowchart in Appendix B delineates the required process for travel from Islamabad, Gwadar, Karachi, Dalbandin Airport, Quetta and Reko Diq Airstrip. A notice of intent to travel is required in all situations. The Client's Travel Notification Form (XXX) will be used as the trigger for travel and acts as the approval form. Advance notice and confirmation will be provided to the Client's Security Manager.

Under current arrangements, the following conditions apply to expat movements:

- Unhindered movement inside the camp.
- Escorted expat movements inside B6 vehicles along main tracks and road sin between Reko Diq and Dalbandin.
- Escorted expat movements inside B6 vehicles throughout the Mining Lease Area.
- All other expat movements throughout the province must have an escort.
- All expat field trips must return to Reko Diq no later than 1800hrs.

- Grid coordinates must be provided along with the Travel Notification Form.

The Client's Field Road Travel Safe Operating Procedure is provided within the Client's Journey Management Plan (6105A0000-HA-12-0001). All Project personnel operating any vehicle off site must:

- hold a current, valid Pakistani Driver's Licence or International Driving Licence
- not be a probationary driver and have a minimum of three years driving experience in relevant vehicles
- have authorisation from the RDMC Project Manager or delegate.

Prior to any journey, vehicle selection must be based on a risk assessment taking into account required tasks, application, environment and vehicle roll-over and crash safety ratings and compliance with the minimum vehicle standards. Drivers must assess the vehicle and equipment, and perform a pre-start check.

The maximum permissible journey time is 12 hours, with a rest break every two hours or less as determined by the driver. Drivers must travel together in convoy with a two-way radio set up to a designated channel which must not be changed during the trip. Where mobile phones may not have reception for any part or duration of the journey, a satellite phone will be provided in one of the travelling vehicles. A nominated person will call the nominated Journey Manager once every two hours for the purposes of a security and safety check in and inform the Journey Manager of their current location and estimated time of arrival to their destination.

For field moves, classified as travelling from the Reko Diq camp into the field being the surrounding areas of Reko Diq, the Fan Sediments and beyond, a RDMC off-site Operational Planning document (XXX) will be completed. The completed document will provide the necessary information for the field team to be tracked and contactable, by the Client's camp and security.

Emergency response procedures will be initiated where a driver fails to return or make contact within one hour of their planned arrival time or scheduled check-in time, or a notification is received that an incident has occurred.

Vehicle windows are to be closed during movement to avoid dust ingress, theft of personal items and reduce the risk of carjacking. Vehicle doors are to be kept locked at all times, and at no time should vehicles be left unlocked and unattended.

### 11.21.2 Driving at Night

Driving at night is to be avoided where possible. Night driving shall only be permitted in exceptional circumstances and must be authorised by the Client's Security Manager.

All vehicles travelling at night will be fitted with auxiliary driving lights, and drivers must exercise extreme caution. The Client's Security and Safety checklist will be completed prior to the journey commencing. Field travel to remote locations will have a security escort.

### 11.21.3 Parking

Vehicles must be parked in a manner that does not pose a risk to persons, property or equipment. Where practical vehicles will be parked on level ground, clear of traffic flow and clearly visible. Vehicles will be reverse parked in designated parking areas.

## 11.22 Mobile Plant

The Company's Management and Operation of Mobile Plant Guideline BRM-GUI-006 provides the minimum standards for the management of mobile plant on the Project. The Contractor is responsible for providing plant operating guidance, procedures and operator training.

Mobile plant for the purposes of this section is any plant that is provided with some form of self-propulsion that is ordinarily under the direct control of an operator, and includes but is not limited to, earthmoving machinery, excavators, cranes, hoists, mobile work platforms, concrete placement booms, forklifts, telehandlers and vehicles with a tare weight greater than 4.5 tonnes.

Mobile plant and equipment must be fit for purpose on arrival to the Project site and in good mechanical condition. On mobilisation to site, all mobile plant must have current statutory registration and a certificate of inspection by an approved third party inspector.

A third-party Contractor will be responsible for the conduct of mobile plant inspections on site. The third-party Contractor will provide a suitably qualified and competent person to undertake the inspection using the Company's checklists, a Company Supervisor will attend and witness the inspection. The completed inspection will be reviewed and approval granted as appropriate by the Company's Construction Manager prior to the plant being operated on site.

Mobile plant with faults that present a danger to health, safety or the environment will be removed from site immediately until the defects are rectified, and may be presented for subsequent inspection for approval prior to commencing operation. Defects that are not considered as hazardous will be rectified in the timeframe specified by the Client / Company and inspected prior to commencing operation.

The Company's Construction Manager or their delegate reserves the right to carry out further inspections on any facilities, plant and equipment (including vehicles) at any time, and reserves the right to direct the removal from site of any facilities, plant or equipment (including vehicles) at any time.

### 11.22.1 Mobile Plant Minimum Requirements

All equipment will comply with, as a minimum; all relevant statutory and site requirements, including the following:

- Rollover protection (ROPS) where determined by risk assessment
- Revolving amber beacon light
- Audible reversing alarm
- Headlights

- Audible horn
- 2-way radio
- Seat belt(s)
- 9 kg fire extinguisher
- Machine guarding in place
- Factory fitted or manufacturer specified retrofitted enclosed cabin
- Air conditioning in the cabin for operator comfort, fitted with filter for dust control
- All windows intact (with no cracks)
- Grilles fitted to mobile plant windows where potential for impact exists, including excavators
- Functional windscreen wipers
- Mirrors.

### 11.22.2 Records and Maintenance

Contractors will maintain documentation / records of the following:

- A certified mechanical inspection report conducted by an approved third party inspector (six monthly).
- A plant risk assessment.
- A plant register containing the details of all plant on site.
- Formal records of a scheduled plant maintenance and inspection program based on original equipment manufacturer specifications as a minimum.
- Pre-start inspection checklists for all mobile plant and vehicles.
- Records of scheduled maintenance, defect reports and certified inspections.

These records must be maintained by Contractors on site and are auditable by the Company.

Mobile plant maintenance will be carried out by qualified and competent mechanics only.

### 11.22.3 Mobile Plant Operators and Verification of Competency

Registered certifications are required for crane operators, forklift / telehandler operators and MWP operators. Registered certifications should be from a body or authority approved by the Company or the Client.

All mobile plant operators will be verified as competent by the Contractor prior to mobilisation to the Project. These assessments and evidence of competency will be maintained by the Contractor on site and are auditable by the Company.

## 11.23 Vehicle Refuelling and Maintenance

All vehicle and equipment maintenance and refuelling will be carried out within designated areas with secondary containment and equipped with appropriate spill response equipment and fire extinguishers. Field maintenance should be kept to a minimum, but where maintenance or refuelling is required in field locations the Contractor will provide appropriate spill response equipment and fire extinguishers to that location. If required, temporary bunds should be utilised dependent upon the nature of repairs.

A site-specific refuelling protocol for equipment, machinery and vehicles will be implemented prior to commencement of work. Smoking, using electronic devices is not permitted while re-fuelling. Engines will be shut down during refuelling.

## 11.24 Traffic Management

Traffic Management Guideline BRM-GUI-005 provides the minimum standards for controlling and managing traffic in a complex site working environment.

All Contractors will develop traffic management plans relevant to their day to day operations and submit them to the Company's Construction Manager for review and approval. It is the responsibility of each Contractor to coordinate traffic movements under their control on the site which may impact on other Project personnel, mining operations, other Contractors and delivery of services to the site. The Contractor will obtain all permits, utilise qualified escort personnel and be responsible for placement of signage and traffic controllers where required.

All signage used for traffic control, speed control and directional control of traffic will comply with the Country's standard, or if not available, the Western Australian Main Roads standard and will be mounted no less than 1.8 metres from ground level to be visible to the operators of the largest haul vehicles used on site.

The guideline specifies the traffic control principles that will apply to traffic management on the Project. Contractors must comply with each of these principles, both in the field and documented in their Traffic Management Plan, and any relevant Project training / induction.

Project personnel must give sufficient notice to allow for consultation and coordination of traffic movements. The requirements for traffic management notices are specified in the guideline, including the requirement to issue traffic management notices to the Company at a minimum of 24 hours prior to any proposed road closure, detour and arrival of wide loads or other situations that may disturb the normal flow of traffic.

A risk assessment (e.g. JHA) is required to accompany any traffic management notice or plan, and will include at minimum the Identified Hazards in the guideline.

The Contractor will comply with the traffic management requirements specified in the guideline in relation to electric cables and powerlines. The Company has adopted electric cable and powerline standards based on the minimum requirements of ENA NENS 04-2006 National Guidelines for Safe Approach Distances to Electrical and Mechanical Apparatus, with an additional safety factor built in.

Traffic signs, excavations / batters, haul roads, ramps must meet the specifications in the guideline.

## 11.25 Vehicle Loading Cranes

Only licenced crane operators and operators that hold the appropriate High Risk Work Licence may operate vehicle loading cranes (VLC). Workers must pass the Vehicle Loading Crane Practical Assessment BRM-FRM-051 and be signed off by the Company's Construction Manager before they can operate a VLC on site.

All VLC use must comply with the requirements of Loading and Unloading Guideline BRM-GUI-021.

## 11.26 Chemical Management

Contractors will manage the safe storage, handling, end use, and disposal of all hazardous substances used on site, in compliance with the Company's Chemical Management Procedure BRM-PRC-027, which outlines the requirements for the identification, evaluation and control of chemical substances so that risks associated with the introduction, handling, storage, use, transport and disposal are managed to an acceptable level. For the purposes of this section, the term 'chemical' applies to gases, dry chemicals, hydrocarbons and wet chemicals.

Contractors must provide workers with the appropriate training to manage exposure to workplace hazardous materials, meet compliance with regulatory requirements and apply proper use and maintenance of PPE.

The Company will conduct periodic assessments of all work areas to confirm the identification, location, quantity and type of hazardous materials aligns to the information provided by Contractors, and the Project Chemical Register and Inventory Record (add doc number).

### 11.26.1 Chemical Introduction and Risk Assessment

Prior to commencing work on site, Contractors are required to submit a hazardous materials management plan and proposed list of chemicals for site use to the Company's HSE Manager using Chemical Introduction Request BRM-FRM-096. This requirement is documented in the pre-mobilisation checklist. The SDS and Chemical Review CLP / GHS Classification Form BRM-FRM-115 (or Chemical Review NFPA Classification Form BRM-FRM-114) must be attached to the Chemical Introduction Request form for each chemical.

The Company's HSE Manager will review all chemical introduction requests and will advise if the request is accepted or rejected. Any chemical which poses an unacceptable level of risk will be rejected and an alternative substance is to be sourced.

All chemicals accepted for use on the project will be added to the Project's Chemical Register and Inventory Record BRM-REG-012. A copy of the completed Chemical Introduction Request and Chemical Reviews will be provided to the Contractor and Client.

### 11.26.2 Chemical Register and Inventory Record

The Company's HSE Manager will maintain the Project Chemical Register and Inventory Record (add doc number).

Each Contractor is required to maintain their own Chemical Register and Inventory Record, which will include the following information:

- Chemical name, uses and supplier name
- Whether or not the chemical is hazardous and date of Risk Assessment if classified as hazardous
- Approval status and date of approval
- Date brought on site and location.

The Chemical Inventory Record for bulk products will include the following information:

- Product name
- ADG / NFPA / GHS classification and code
- Package size, number of packages, total stock on hand
- Storage location.

### 11.26.3 Labelling of Containers

All substance containers must be correctly labelled in alignment with Safe Work Australia's Labelling of Workplace Hazardous Chemicals Code of Practice so that workers can identify any hazards associated with the classification of the chemical. Labels will include, but are not limited to:

- Labelled in the local language and/or English
- The product identifier
- The name, address and business telephone number of the manufacturer or importer
- Hazard pictogram(s) consistent with the classification of the chemical
- Hazard statement(s), signal word and precautionary statement(s) consistent with the classification of the chemical

- Any information about the hazards, first aid and emergency procedures relevant to the chemical not otherwise included in the hazard statement or precautionary statement

- The expiry date of the chemical, if applicable.

Any container containing a substance that does not have a label or is incorrectly labelled must be correctly labelled, where the contents of the container are known and confirmed.

If the contents are unknown, the container must be discarded into the appropriate waste stream or tagged 'Out of Service' and stored in a safe location until the contents can be correctly identified and the contained can be labelled.

### 11.26.4 Decanting of Substances

Decanter containers must be clean, free from contaminants and appropriately labelled with the substance name and any hazard or precautionary statements that apply.

Workers must wear PPE including respiratory, eye and face protection in compliance with the SDS requirements to protect from chemical vapours, fumes, splashes and spillages, particularly during chemical transfer and decanting involving chemicals that are not fully enclosed during transfer.

Handling equipment (e.g. transfer hoses) will be kept in a fit for purpose / well maintained condition.

### 11.26.5 Storage of Chemicals

The Contractor will provide chemical storage areas with containment bunds constructed in accordance with the Australian Standard AS1940:2017 Storage and handling of flammable and combustible liquids or country standard, whichever is more stringent.

Hazardous substances and other chemicals will be stored by the Contractor according to the requirements of the relevant SDS. Incompatible substances are not to be stored together. Contractor HSE Advisors are responsible for identifying incompatible chemicals under their control, and their storage and handling requirements.

The Contractor will install signage to clearly identify the location of chemical storage areas, which must be identified and designated prior to the commencement of work activities. The Contractor will provide adequate spill response and fire equipment at chemical storage areas. Scheduled inspections of these areas and equipment will be conducted in accordance with the Site Audit and Inspection Schedule BRM-FRM-084.

Packaged chemical products will be stored within a secondary containment system such as bunded area or on bunded pallets, or in a roofed storage room equipment with a containment drain and adequate ventilation. Containers in use outside of chemical containment areas are to be placed on bunded pallets or spill trays.

Storage and bunding equipment (e.g. bunded pallets) will be kept in a fit for purpose / well maintained condition.

### 11.26.6 Bulk Storage, Handling and Disposal

Bulk Chemical Storage, Handling and Disposal Procedure BRM-PRC-026 provides direction the safe storage and handling of bulk chemicals and hydrocarbons, including chemical tracking, delivery and waste disposal. All bulk chemicals stored on site will be recorded on the Chemical Register and Inventory Record (add doc number), within the inventory record section.

Refer to Appendix A Placard and Inventory Quantities of the Chemical Management procedure BRM-PRC-027 for inventory record level and placard requirements.

Contaminated Waste Management Disposal Procedure BRM-PRC-031 and Contaminated Waste Tracking Form BRM-FRM-045 provide specific requirements for the management of contaminated waste.

### 11.26.7 Spill Response

The Contractor will provide adequate spill response equipment as a minimum in chemical storage areas, in delivery vehicles, and in relevant site locations, in addition to effluent and wastewater storage locations.

All spills are to be cleaned up in accordance with Spill Prevention and Control Procedure BRM-PRC-030. Any spill response equipment used in response to a chemical spill or that is not fit for purpose must be replaced as soon as practicable by the Contractor.

All spills will be reported, investigated and classified in accordance with the Incident Management and Investigation Procedure BRM-PRC-018.

### 11.26.8 Chemical Waste Disposal

In accordance with Contaminated Waste Management and Disposal procedure BRM-PRC-031, potential contaminated waste streams for the Project may include, but are not limited to, biological waste, chemical waste and radioactive waste.

Prior to the commencement of construction works, all potential site contaminated waste streams must be identified. An inventory will be maintained by Contractors, including:

- Contaminated waste types
- Waste origin
- Environmental risks and impacts of contaminated waste types
- Volumes of contaminated waste produced and stored
- Contaminated waste storage details and location
- Contaminated waste management requirements for treatment and/or disposal

- Any licensed waste contractor details.

Contractors will identify and assess actual and potential risks of transporting, storing, using and disposing of contaminated waste and their waste management processes will comply with relevant regulatory and legislative requirements, and the standards adopted by the Company.

Waste chemicals and contaminated waste from the clean-up of spills is to be collected and stored in water type containers with closed lids and stored in designated and signposted areas for proper disposal. All contaminated waste storage containers will be labelled to clearly identify the waste contents.

Oil contaminated waste such as used filters and oily rags will be segregated from the waste stream and disposed of

Contaminated Waste Tracking Form BRM-FRM-045 or approved Contractor equivalent will be utilised, including as a minimum the requirements documented in the procedure.

## 11.27 Safety Incentive Scheme - to be discussed with Client

Safety incentive schemes reward positive safety behaviour and culture; they also identify those teams where additional assistance may be required to improve performance.

The Company will establish a safety incentive scheme that rewards positive safety behaviour and culture on a weekly / fortnightly / monthly basis.

## 11.28 Performance Measuring and Reporting

The Contractor will implement and maintain performance indicators to monitor the effectiveness of its HSE management system on the Project. These indicators will monitor both input processes (compliance with programme standards) and lead and lag outcomes, e.g. first aid injuries and various injury frequency rates.

Records of these indicators will be provided to the Company's Construction Manager and HSE Manager on a weekly basis and on request.

As a minimum, the Contractor will record and supply to the Company Construction Manager at prescribed times each week, the following data.

The number and analysis of:

- Fatalities (FAT)
- Lost Time Injuries (LTI), including the number of days lost
- Restricted Work Injuries (RWI) including the number of restricted work days
- Medical Treatment Injuries (MTI)
- First Aid Injuries (FAI)

- Occupational Health Injuries / Illnesses (OHI)
- Non-Work Related Injuries (NWR)
- Near Misses
- Environmental Incidents
- Procedural Breach Incidents
- Property Damage Incidents
- Security Incidents
- Hours worked on site by all Contractor personnel
- Division of labour by expatriate, third-country nationals, local workers
- Vehicle checklists
- Audits and inspections
- Behavioural Observations
- Number of employees / subcontractors
- Training
- Drug and alcohol testing.

All of the above data will be provided on the HSE Performance Summary Form BRM-FRM-001, or in a format approved by the Company's HSE Manager or delegate. Incidents and injuries will be classified in accordance with the definitions specified in Incident Management and Investigation BRM-PRC-018.

### 11.28.1 Weekly HSE Performance Summary

The Company's HSE Manager or delegate will collate all Contactor supplied HSE performance reports, and is responsible for submitting the Weekly HSE Performance Summary BRM-FRM-001 to the Company's HSE Manager – HSE Group.

## 12.0 COMMUNITY RELATIONS

As communicated in the Health, Safety, Environment and Community Relations Policy BRM-POL-004, the Company is committed to taking all reasonable steps to improve work practises towards achieving a goal of zero injuries, zero environmental impacts and leaving only positive legacies upon communities in which we operate.

The Client is responsible for the management of community engagement on the Project. Company and Contractor personnel will comply with the requirements of the Client's Community Relations Plan [reference Client's plan].

Access to local community areas by non-residents of those areas will be in accordance with the Client's security and ESR protocols. All Project personnel are required to comply with the Code of Conduct and HSE Values and Expectations as detailed in section 7 of this Plan, which includes expected behaviours in the community.

## 13.0 SITE SECURITY

The Client is responsible for the management and control of security on the Project, including the development, maintenance and implementation of the Project Security Plan (Internal) [insert document number when provided], and Project Security Plan (External) [insert document number when provided].

The Client is responsible for providing training to Project personnel and visitors in relation to security. The Company and Contractors will comply with the requirements of the security plans.

### 13.1.1 Evacuation Plan

The Company's HSE Manager – HSE Group and Project HSE Manager will review the Client's Site Evacuation Plan [insert doc ID when known] at the earliest opportunity for the purpose of developing the Company's Site Evacuation Plan 2270-0000-HPLN-005 in alignment with the Client's processes.

The Company's Project Manager or their delegate will verify continuous coordination with the Client and the Company's CMT in the event of a site evacuation.

Emergency evacuation procedures and muster point locations will be communicated during the Company Induction.

## 14.0 DRONE USE

For the purposes of this section, the term 'drone' refers to an Unmanned Aerial Vehicle (UAV), Remotely Piloted Aircraft System (RPAS), Remotely Piloted Aircraft (RPA) and/or Unmanned Aircraft System (UAS).

Rules and regulations may differ between Countries regarding the use of drones. Drone operators and Construction Managers are responsible for knowing and complying with Country regulations, the recommendations of the manufacturer's instructions, and complying with relevant Company rules. Each Drone Operator must pass the Practical Assessment – Drone Usage BRM-FRM-201 and be approved by the Company's Construction Manager prior to drone usage.

Drone operation on-site may only occur at times when there are no personnel working in the area below (i.e. during lunch breaks, after hours, in vacant and demarcated flight areas, etc.). On the day of operation, during the PSI Meeting, personnel will be notified of the drone's expected flight time, flight

path, purpose of the flight and any additional information that must be known to ensure the safety of personnel. The following rules apply:

- Client approval to fly drones during project construction must first be obtained by the Construction Manager in writing.
- The drone operator will seek approval from the Construction Manager prior to flight, and provide details on flight time, flight path and any risks and controls associated with the flight.
- The operator will conduct a pre-start inspection of the equipment, and confirm there is no damage to the drone that will impact safety or flight performance.
- Drones may only be flown during the day and must be kept within visual line-of-sight. This means being able to see the aircraft with your own eyes (rather than through a device), or by use of a spotter at all times.
- Drones may not be flown higher than 120 metres (400 ft) above the ground, or less in countries where specific limits apply, (e.g. Côte d'Ivoire states a maximum horizontal distance of 200 metres from the remote pilot and a maximum height of 50 metres (for drones less than 2 kg used for leisure or competition purposes.)
- Drones must be kept at least 30 metres away from other people during operation.
- Never fly a drone over or near an area affecting public safety or where emergency operations are underway (without prior approval). This could include situations such as a car crash, police operations, a fire and associated firefighting efforts, search and rescue, etc.
- Only one drone may be flown at a time.
- Never fly a drone over or above people.
- If the drone weighs more than 100 grams, a distance of at least 5.5 kilometres must be maintained away from controlled aerodromes.
- Respect personal privacy. Do not record or photograph people without their consent.

Any incident or near miss event resulting from or during drone operation must be reported and investigated in accordance with Incident Management and Investigation BRM-PRC-018.

## 15.0 AUDIT, INSPECTION, MONITORING AND REVIEW

Audit, Inspection, Monitoring and Review Procedure BRM-PRC-048 establishes the principles and system requirements for auditing, inspection, monitoring and management review that will effectively test compliance with health and safety operational processes and verify that activities are conducted in a manner which minimises risk.

## 15.1 Audits

### 15.1.1 Project Audits

The Company's HSE Manager and/or Lead HSE Advisor will prepare a Site Audit and Inspection Schedule BRM-FRM-084 prior to the commencement of the Project.

The Company's HSE Manager will:

- Manage project audits in compliance with Site Audit and Inspection Schedule BRM-FRM-084, prioritised by risk, and in alignment with the requirements of the HSEMP.
- Evaluate audit evidence using approved audit tools to determine if management processes and controls implemented by the Contractor are effective.

### 15.1.2 Contractor Audits

The Company's HSE Manager will establish an audit plan and schedule of audits for each Contractor in accordance with the HSE Responsibilities Checklist at Appendix B.

Each Contractor is required to attend and participate in monthly formal HSE audits conducted by the Company. The Company's HSE Manager will notify the Contractor of the audit, and will complete the audit on approved Company templates with the assistance of the Contractor as required.

The audit process will include a review of audit findings and approval of recommendations / corrective actions. An audit findings report that recommends corrective actions will be submitted to the responsible manager. Corrective actions will be registered in the Project Corrective Action Register and will be monitored by the Project corrective action process. The Project Manager will be provided with feedback on the audit results.

A review of JHA and Take 5 quality, currency and application will be conducted in compliance with the Audit and Inspection Schedule.

The Company may recognise exemplary performance by Contractors based on a score derived from the monthly compliance audit.

### 15.1.3 Corporate HSE Audits

The Project may be audited as part of periodic external audits of corporate and project HSE Management Systems. Audits will be scheduled in accordance with Site Audit and Inspection Schedule BRM-FRM-084 and communicated to senior and project management.

A Corporate HSE Audit using Corporate HSE Audit Checklist BRM-FRM-086 will be conducted annually by the HSE Manager – HSE Group or their delegate, with the assistance of Project personnel as appropriate.

## 15.2 Workplace Inspections

Workplace inspections are designed to identify the extent of physical conformance to set standards, identify visible hazards and risks, and improve the physical conditions.

### 15.2.1 Planned Inspections

The Contractor will initiate and maintain a system to manage the regular and systematic inspection (using an area specific checklist) of workplaces to identify hazards and unsafe practices. Appropriate controls are to be implemented and regular records of these activities will be provided to the Company's HSE Manager and Construction Manager.

The Company's HSE Manager will implement an inspection program in compliance with Site Audit and Inspection Schedule BRM-FRM-084 and the HSEMP. The inspection requirements will be communicated to all those with accountability under the HSEMP and senior management as appropriate.

Audits will be undertaken involving Contractor supervision and the Company's representatives in accordance with the HSE Responsibilities Checklist in Appendix B. Inspection reports will be maintained within the Project filing system for auditing purposes.

### 15.2.2 RGBY Inspections

The Contractor shall maintain an equipment register that includes all equipment that is to be inspected under the RGBY system, in addition to maintaining records of inspection and service.

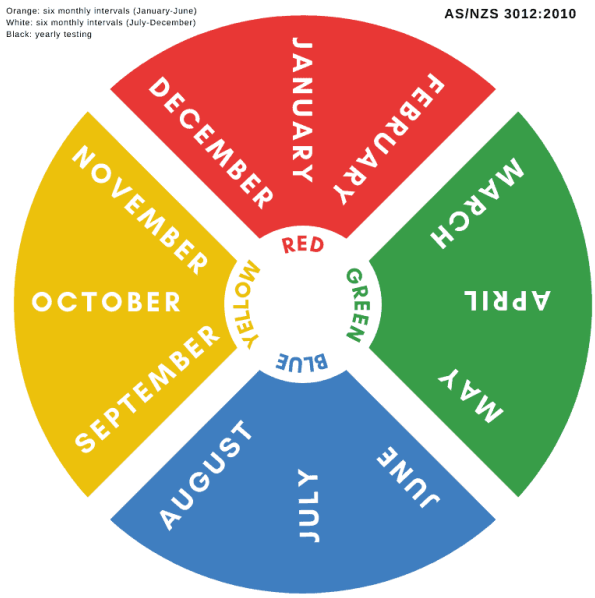
The recorded information should include:

- Manufacturers / suppliers details
- Batch or serial number
- Year of manufacture
- Date of purchase / date put into service
- Dates and details of past inspections and maintenance
- Next inspection date.

Equipment inspected under the RGBY system includes electrical equipment (office, field and workshop), lifting gear, ladders and fall prevention devices.

Each quarter is represented by a specific colour tag (Red, Green, Blue or Yellow), which allows easy visual reference to verify that the equipment is safe to use.

**Figure 15.1 RGBY Test & Tag Colour Chart**




Each item of equipment shall be inspected by a competent and/or licenced person and be affixed with the corresponding coloured tag for the quarter.

Any equipment subject to the RGBY inspection system that is found in service without a tag must be removed and re-inspected by a competent person and tagged.

Any equipment identified as unserviceable during the inspection process must be removed and tagged Out of Service.

## 15.3 Monitoring and Measurement

As per Audit, Inspection, Monitoring and Review BRM-PRC-048 procedure, the Company and Contractors will implement, maintain and review monitoring and evaluation programs to assess the effectiveness of their HSE Management systems for the Project..

This will be achieved through monitoring of the measurables for the Project, documented in Table 4.1 Performance Measures and Targets and the HSE Responsibilities Checklist in Appendix B, such measures include:

- Key Performance Indicators for Management and Supervisors (see Project KPIs). These indicators include but are not limited to attendance at pre-start safety meetings, observations, toolbox meeting attendance and workplace inspection.
- Corrective actions closed out for inspections, hazard reports, incident investigations, audits and any individual corrective actions.

- Meetings conducted prior to starting a workday, a weekly toolbox, HSE meeting and other safety communications as deemed to be required by the Company's Project Management Team.
- Audits of the HSE Management system and Contractor system conducted by the Lead Corporate HSE Advisor and Company's Project HSE team respectively.
- The Company will audit the Contractor against the Project system and verify that the contractor complies with the Project HSE Management system.
- JHAs are developed for relevant tasks.
- Risk assessments for Project phases and contractor Scope of Works.
- Inspections carried out on a daily basis by Contractor supervision and management, and by the Project HSE team and the Company's supervision.

### 15.3.1 Monitoring Schedule

The Project will develop a documented monitoring schedule appropriate to the level of risk and legal obligations.

### 15.3.2 Key Performance Indicators (KPI)

The KPI's established in Table 4.1 Performance Measures and Targets are monitored and reported on a weekly basis to the Company's Project Manager, Group Manager – Projects and the HSE Manager – HSE Group using the HSE Performance Summary BRM-FRM-001.

Lead and lag indicators (e.g. LTIFR and TRIFR) are reported in the Company's Monthly board and Operations reports.

### 15.3.3 Calibration of Monitoring Equipment

All Company and Contractor monitoring and measuring equipment (e.g. gas detectors, breathalysers etc) will be regularly maintained, serviced and calibrated, according to the manufacturer's instructions and/or recognised standards.

Calibration records are to be maintained as records and may be audited by the Company.

## 15.4 Management Review

The management review process includes discussion as part of monthly HSE meeting agenda, ongoing formal review of HSEMS, review of monthly board reports including monitoring and measuring results for projects, project review meetings with senior management representatives.

Senior management will also conduct site reviews when they travel to the Project to address suitability, adequacy and effectiveness of the Project HSEMS.

Management review records will be maintained as required.

## 15.5 Non-Conformance and Corrective Actions

Non-Conformance and Corrective Action Management procedure BRM-PRC-038 provides the process for managing non-conformances and corrective actions from identification through to mitigation within the Company's HSEMS.

Non-conformances will be recorded in INX and will be allocated to the relevant workgroup as well as relevant Project personnel for review, action and close out. Non-conformances will be documented within the relevant management system, assessed, mitigated and recorded within INX and the Project's Corrective Actions Register BRM-REG-011.

The Corrective Actions Register will be maintained by the Company's Project HSE team. Corrective actions, observations and hazard notifications will be recorded as part of the activity conducted. All issues raised for corrective action will be entered into the corrective action register by the Contractor's HSE Advisor. If an action is raised by the Company, the Contractor will be notified in writing as soon as is practicable.

Contractor Site Managers are responsible for managing outstanding corrective actions in a timely manner. The management of items in the corrective action register will be monitored by the Company's HSE Manager and reported to the Company's Construction Manager. All corrective actions are to be addressed with affected persons prior to implementation. This may be conducted individually or as a group meeting.

Corrective actions may be raised from the following areas:

- Inspections - corrective actions entered after an inspection of a workplace using one of the weekly inspection reports. Supervisors will be expected to enter the actions on to the register and when they expect to close out the corrective action. Sign-off of an inspection corrective action will be by either the relevant area supervisor or one of the HSE Advisors on site.

- Incidents - corrective actions will be entered by the project HSE Advisor as a result of incident investigations. Supervisors will be expected to visit the Corrective Actions Register on a regular basis to close out any corrective actions applying to their particular area.

- Audits – corrective actions resulting from Contractor audits will be entered by the project HSE Advisor within the Corrective Actions Register. Action items are monitored for close-out on a weekly basis.

# 16.0 PROJECT CLOSEOUT

The Company's Project Closeout Procedure PRJ-PRC-017 identifies the requirements to close out a project, including the requirement for a Project Closeout Report. The Project Closeout Report template is to be utilised and will include HSE performance and statistics (Company and Contractor).

A Health, Safety and Environment Report will also be provided. This summarises the HSE data recorded during the project. In addition to an analysis of the HSE performance (including audits and reporting) of

the construction contractors and Company site personnel, the total manhours, safety statistics, injury analysis and recommendations are included. The HSE statistics are summarised and included within the Lessons Learned database.

# 17.0 DOCUMENT CONTROL

The Reko Diq Document Control Procedure 2270-0000-GPRC-001 defines the document management processes and stakeholder responsibilities that apply to the administration and formal distribution of controlled technical documents and drawings generated for the Project, study and Company engineering work.

The procedure described the Project standard for document control and electronic management of all files produced or received on the Project. This includes all Contractor HSE documentation and deliverables for mobilisation, which must be issued by the Contractor to the Company as per the requirements of the procedure.

ProjectWise is the Company's electronic collaboration system where Project data is made available in real time at the latest revision to all Project personnel.

## 17.1 Electronic Filing

All HSE documents produced or received during the Project are to be filed electronically on ProjectWise under the Project sub directory 15.0 HSE.

## 17.2 Hardcopy Filing

If a document has been scanned and filed electronically into the Company's filing structure, there is no requirement to maintain hard copy originals. Hard copy originals that cannot be scanned will be kept in accordance with the archiving requirements referenced in the procedure.

## 17.3 Archiving

At the conclusion of the Project, the Company's Project Manager will confirm compliance with the requirements of the Project Closeout Procedure PRJ-PRC-017 which includes initiating archiving and closeout processes. Records will be retained as per relevant legislative requirements.

# 18.0 DOCUMENT REVISION

Revisions to this plan will be signed as authorised by the Company. Refer to Appendix E for further information relating to revisions of this HSE Plan.

# 19.0 DISTRIBUTION

The Company will verify that this Plan is distributed in accordance with Appendix F. This plan will be transmitted in an agreed manner, receipt of the plan will be acknowledged and retained by the Company.

# 20.0 HSE DOCUMENT ACCESSIBILITY

Company-wide documents (such as corporate policies and procedures) are accessible on the Company's intranet. The Project HSEMP and reference documents will be transmitted to Contractors via the Company's Document Control department. The HSEMP and documents supplied are controlled documents.

The Company maintains a corporate subscription to Intertek Inform where employees can access Australian / International standards and legislation via a link on the Company's intranet. Contractors are required to provide access for their workers to relevant standards.

## APPENDIX A

## MOBILISATION AND START-UP PLAN

## MOBILISATION AND START-UP CHECKLIST – MEDICAL AND TRAINING

| Requirement | Attendee | Timeframe | Estimated Hours | Provider | Responsibility | | Comment |
|---|---|---|---|---|---|---|---|
| | | | | | Company | Contractor | |
| Client Site Clearance | All personnel | Start of Project | 72 | Client / Company | ☑ | ☑ | Access granted by Client |
| Medical Examination and Laboratory Drug and Alcohol Screening (LABDAS) | All personnel | Prior to mobilisation | - | Contractor | | ☑ | Records to be maintained |
| Alcohol Testing | All personnel | Site commencement Random, for cause | 0.25 | Contractor | ☑ | ☑ | Daily random testing and for cause |
| Driver's Licence | Those required to drive on Site | Prior to driving the vehicle | - | Police | | ☑ | Statutory requirement |
| Site Driver's License | Those required to drive on Site | Prior to driving the vehicle on site | | Company | ☑ | | Requires CM Approval |
| Client Project Induction | All personnel | Before undertaking any work on site | 4 | Client / Company | ☑ | | |
| Company Construction Induction | All personnel | Before undertaking any work on site | 4 | Company | ☑ | | |
| Contractor Inductions | All Contractor personnel | Prior to mobilisation | - | Contractor | | ☑ | |
| Correct use and maintenance of PPE | All Contractor personnel | Prior to mobilisation | 1 | Contractor | | ☑ | |
| Fire Extinguisher Training | All Contractor personnel | Within two weeks of mobilisation | 2 | Contractor | | ☑ | All personnel |
| Scaff Tag Training | All who are required to erect, dismantle, inspect scaffold | Prior to mobilisation | 2 | Contractor | | ☑ | Personnel who work with scaffolding |
| Hazardous Materials Management Training | All Contractor personnel | Prior to mobilisation | 1 | Contractor | | ☑ | |
| Isolation Training | All persons required to work on equipment that is capable of energising | Prior to working on live equipment | 3 | Client / Company | ☑ | ☑ | |
| Other Project Training as | All Contractor personnel | During Project | Allow ½ h per | Contractor | | ☑ | As required |

| Requirement | Attendee | Timeframe | Estimated Hours | Provider | Responsibility | | Comment |
|---|---|---|---|---|---|---|---|
| | | | | | Company | Contractor | |
| required by the Company | | | employee per week in addition to the above | | | | |

## MOBILISATION AND START-UP CHECKLIST - GENERAL

| Contractor Deliverables | Commencement | Records | Daily | Weekly | Monthly | Quarterly |
|---|---|---|---|---|---|---|
| Contractor to submit the resumes of the Contractor's proposed HSE resources to be reviewed by the Company's HSE Manager | To be transmitted to Company HSE Manager 21 days prior to mobilisation<br><br>Company HSE Manager to approve proposed HSE resources in writing 14 days prior to mobilisation | Company HSE Manager to maintain a record of Contractor's proposed HSE resources | | | | |
| Mobilisation Paperwork:<br>HSEMP, Plant Risk Assessments, Work Procedures / Safe Work Method Statements / JHAs | Transmitted to Company HSE Manager 7 days prior to mobilisation, must be in English<br>Relevant Company Supervisors to review Work Procedures / SWMS and sign off acceptance | Register to be maintained by Contractor | | | Monthly Audit / Review | |
| Individual personnel mobilisation details | Transmitted to the Company HSE Manager weekly | Register to be maintained by Contractor | | Email weekly | Monthly Audit / Review | |
| Risk Register - WRAC | Transmitted to Company HSE Manager 7 days prior to mobilisation, must be in English | Register to be maintained by contractor and integrated into Project RR | | | Monthly Audit / Review | |
| All Mobile Plant:<br>• Current Certificate of Inspection – 6 monthly third party inspection<br>• Current Statutory Registration<br>• Crane Inspection – Site using Company approved Crane Inspection Checklist | Register transmitted to Company HSE prior to mobilising to site<br>Updates provided as renewed<br>On mobilisation, must be registered, inspected and approved by Company Construction Manager | Register to be maintained by Contractor<br><br>Crane Site Inspection records to be maintained Company | | | Monthly Audit / Review | |

| Contractor Deliverables | Commencement | Records | Daily | Weekly | Monthly | Quarterly |
|---|---|---|---|---|---|---|
| Plant / Vehicle Maintenance / Inspection<br>Detailed maintenance programme for each plant / vehicle to include scheduled servicing (on checklists)<br>Maintenance programme to comply with Original Equipment Manufacturer recommendations (OEM) as a minimum, using a qualified mechanic<br>Refer to s16.6 | Transmitted to Company HSE Manager 7 days prior to mobilisation, must be in English | Maintenance Register and all inspection records to be maintained by Contractor | Daily Pre-Start | As per OEM requirements | Monthly Audit / Review | As per the Maintenance Programme / OEM requirements |
| Worker Competency Certificates including drivers licences and equipment, trade and other accredited training records | Transmitted to Company HSE Manager 7 days prior to mobilisation | Register to be maintained by Contractor and Company<br>Updated when required with renewals etc. | | | Monthly Audit / Review | |
| Fit for Work Certificate | Transmitted to Company HSE Manager 7 days prior to mobilisation | Register to be maintained by Contractor | | | Monthly Audit / Review | |
| First Aid Register | Confirm minimum ratio of 1:25 First Aid trained personnel to workers.<br>All electrical workers and assistants to be first aid trained. | Register to be maintained by Contractor | | | Monthly Audit / Review | |
| Fire Extinguisher Register | Transmitted to Company HSE Manager 7 days prior to mobilisation | Register to be maintained by Contractor | | | Monthly Audit / Review | |
| Fire Extinguisher Inspection | Inspection required prior to mobilisation, inspection compliance must be indicated on fire extinguisher tag for each extinguisher | Register to be maintained by Contractor, units to be marked quarterly | | | Quarterly inspection by competent person<br>Monthly Audit / Review | |
| Compliant Electrical Power Tools, Plant and Installations: fitted with protection circuits, guarding, compliant with relevant Australian standards | Testing / inspection required prior to mobilisation | Register to be maintained by Contractor | By all personnel prior to use | | Monthly Audit / Review | Quarterly inspection by qualified electrician using the RGBY system |

| Contractor Deliverables | Commencement | Records | Daily | Weekly | Monthly | Quarterly |
|---|---|---|---|---|---|---|
| Working at Heights Equipment Register | Testing required prior to mobilisation | Register and certificates to be maintained by Contractor | By all personnel prior to use | | Monthly Audit / Review | Quarterly inspection using RGBY system, to be carried out by Advanced Rigger with Safe Working at Heights Training |
| Lifting/Rigging Register<br>All lifting devices and accessories to be inspected by an authorised third party provider annually | Testing required prior to mobilisation | Register and certification to be maintained by Contractor | By all personnel prior to use | | Monthly Audit / Review | Quarterly inspection using RGBY system to be carried out by Advanced Rigger |
| Ladder Register | Testing required prior to mobilisation | Register to be maintained by Contractor | By all personnel prior to use | | Monthly Audit / Review | Quarterly inspection using RGBY system by competent person |
| Hazardous Materials Management Plan<br><br>Chemical Register and Inventory Record<br><br>SDS Register and copies of SDSs<br><br>SDS to be provided in English and the local language (where possible) | Approval required prior to bringing hazardous goods on-site, register and copies to be established<br>Register to be supplied to Company HSE Manager, 7 days before arrival on site | Register to be maintained by Contractor | Updated when new items brought and approved for site | | Monthly Audit / Review | |
| JHA Register and copies of JHA | JHAs to be prepared and approved by Company prior to commencement of work | Register to be maintained by Contractor | Currency and relevance of JHA checked daily by Contractor Supervision | Re-written weekly if different location, task, hazards | Monthly Audit / Review<br>Maximum of one month duration at Company HSE Manager discretion | |
| Fire Control Plan | Transmitted to Company HSE Manager 7 days prior to mobilisation | Register of hazardous goods, Fire Control Plan maintained and updated as required | | | Monthly Audit / Review | |

| Contractor Deliverables | Commencement | Records | Daily | Weekly | Monthly | Quarterly |
|---|---|---|---|---|---|---|
| Health and Welfare Monitoring Procedure | Provide to Company HSE Manager 7 days prior to mobilisation | Monitoring register maintained by Contractor | | Weekly review and report to CM | Monthly Audit / Review | |
| Infectious Diseases Management Plan | Provide to Company HSE Manager on award of contract for approval, prior to mobilisation to site | Contractor Infectious Diseases Management Plan approved in writing by Company HSE Manager and Project Manager | | | Monthly Audit / Review | |
| Crane Lifting Studies | Copy required & reviewed by Company Superintendent for approval prior to complex lifts | Records maintained by Contractor | | | Monthly Audit / Review | |
| Permits – CSE, Isolation, Excavation, Hot Work, Grid mesh, WAH | Issued by Company prior to task | Register maintained by Company HSE Manager.<br>Contractor issued permits maintained on register by Contractor where applicable | As required | | Monthly Audit / Review | |
| Pre Shift Information Meetings, FFW testing | All Contractors to attend daily and sign on | Contractors to maintain records | Daily | | Monthly Audit / Review | |
| Toolbox Meetings | All Contractors (including management) to attend meeting | To be documented using a Project approved Weekly Toolbox Meeting template<br>Incorporated in weekly statistics | | Weekly | Monthly Audit / Review | |
| Incident Reports | Notification of incident required ASAP on the day of occurrence.<br>Resulting corrective actions reviewed by Company HSE Manager | Records maintained by Company<br>Incorporated in weekly statistics | | Weekly review and report to CM | | |
| Hazard Reports<br><br>Corrective Actions Register | Contractors to close out hazards and report details to HSE Advisor<br>Corrective Actions register to be commenced and maintained | Contractor to maintain individual Registers<br>Incorporated in weekly statistics | | Register will be subjected to weekly review by the Company | Monthly Audit / Review | |

| Contractor Deliverables | Commencement | Records | Daily | Weekly | Monthly | Quarterly |
|---|---|---|---|---|---|---|
| Scaffolding<br>(to be erected, dismantled or altered by a qualified scaffolder) | Scaff tag system must be in place<br>Scaffold register to be current at all times | Register to be maintained by Contractor | By user prior to use | Weekly by qualified scaffolder | Monthly Audit / Review | |
| Site Inspection – Contractor Supervisors | Using Contractor inspection documents | Register maintained by Contractor.<br>Remedial actions to be entered in Project Corrective Action Register<br>Incorporated in weekly statistics | | Weekly<br>Outcomes discussed at meeting | Monthly Audit / Review | |
| Site Inspection – Company Supervisors | Choice of inspection using standard inspection forms | Register to be maintained by Company<br>Incorporated in weekly statistics | | Weekly<br>Outcomes discussed at meeting | Monthly Audit / Review | |
| Site Inspection – Company HSE Advisors | Choice of inspection using standard inspection forms | Register to be maintained by Company<br>Incorporated in weekly statistics | Daily<br>Outcomes discussed at meeting | | Monthly Audit / Review | |
| Site Inspection – Contractor HSE Advisors | Using Contractor inspection documents | Register to be maintained by Company<br>Incorporated in weekly statistics | Daily<br>Outcomes discussed at meeting | | Monthly Audit / Review | |
| HSE Performance Reports | Contractor completes using Performance Summary BRM-FRM-001 | Performance Summary to be submitted to the Company HSE Manager | | Report submitted weekly | | |
| HSEMP Compliance Audits | Will be conducted monthly by the lead Company HSE Advisor for all contractors on site<br>Corrective actions will be assigned and reviewed weekly by the Company HSE Manager | Audit records maintained by Company | | Corrective actions reviewed | Monthly Audit / Review | |

**HSE** = Health, Safety, Environment
**WRAC** = Workplace Risk Assessment and Controls
**SOPs** = Standard Operating Procedure

## APPENDIX B

## PROJECT HSE RESPONSIBILITY CHECKLIST

## PROJECT HSE RESPONSIBILITY CHECKLIST

| Item | Action | Method | When | By Whom |
|---|---|---|---|---|
| 1. | Conduct Risk Assessment | Conduct workplace risk assessment and control, and establish priorities | Before commencement of each phase | Project Management Team / On-site Contractor Supervision / Management<br>Company HSE Manager |
| | | Implement action plans | As appropriate | |
| | | Monitor compliance | As appropriate | |
| 2. | Manage High Risk Work including:<br>Confined Space<br>Hot Work<br>Working at Heights<br>Grating / Grid Mesh<br>Congested work areas<br>Isolation<br>Vehicles<br>High Voltage Conductors | Identify potential high risk areas, and establish training programme as required | Before commencement of each phase | Company HSE Manager |
| | | Review Company procedures and confirm appropriate systems and controls are established to manage high risk areas | Prior to work commencing | Company HSE Manager |
| | | Train all supervisors | Ongoing | Contractor / Company Construction Manager |
| | | Train involved workers | As required | Supervisors and Superintendents |
| | | Monitor compliance | Daily inspections, monthly contractor audits | Supervisors, Company HSE Manager, Contractor HSE Advisors |
| 3. | Legal and Other Requirements | Identify and obtain copies of all relevant legal documents pertaining to the project, including health, safety, environmental, human resources, industrial relations, human rights and agreements | Before commencement of the project | Project Management Team and Company HSE Manager |
| | | Review on a regular basis<br>Distribute to appropriate personnel | As appropriate<br>As appropriate | Company HSE Manager<br>Company HSE Manager |
| 4. | Induction to HSEMS | Brief senior contract personnel on requirement at pre-tender meetings | Prior to submission of tender document | Corporate HSE Manager and Project Manager |
| | | Brief construction personnel on HSE requirements of contract | Following mobilisation to site | Company HSE Manager |
| | | Conduct Project Inductions<br>Inspect vehicles and equipment | Following mobilisation to site<br>At time of mobilisation | Company HSE Manager<br>Client Company, Contractor, Supervisors |

| Item | Action | Method | When | By Whom |
|---|---|---|---|---|
| | | Issue electronic copy of HSEMP | On award of contract | Corporate HSE Manager / Document Control |
| | | | Kick off meeting on site | Company HSE Manager / Document Control |
| 5. | Contractor Management | Pre-start Inspection (PSI)<br>Inductions | Daily<br>Throughout project | All personnel<br>Company HSE Manager and Contractor Management |
| | | Tool Box Meetings<br>HSE Meetings<br><br>Contractor Progress Meetings | Weekly<br>Weekly<br><br>Weekly | Contractor Manager<br>Company HSE Manager and Contractor HSE personnel<br>Company Construction Manager and HSE Manager, Project Personnel and Contractor Management |
| | | Informal Workplace Inspections | Before starting work | Contractor Manager |
| | | Formal Workplace Inspections | Daily | Company HSE Manager and Contractor HSE Advisors |
| | | Formal Workplace Inspections | Weekly | All Company and Contractor Supervisors, including Managers |
| | | Preparation of JHA | As appropriate | Supervisors and Workers |
| | | Monthly audits | Monthly | Company HSE Manager and Contractor Manager |
| 6. | Emergency Preparedness | Review Client ERP, identify any deficiencies and communicate to the CM<br>Develop Company ERP aligned to the Client ERP<br><br>Company Plan: Communicate ERP to Project personnel and confirm compliance with Plan<br><br>Schedule emergency exercises as per the ERP to include:<br>Fire fighting | At the earliest opportunity on site<br><br>At the earliest opportunity on site<br><br>At start of project and in compliance with ERP | Company HSE Manager in conjunction with Client<br><br>Company HSE Manager<br><br>Company HSE Manager |

| Item | Action | Method | When | By Whom |
|---|---|---|---|---|
| | | Rescue at Heights<br>Rescue from Confined Space | | |
| 7. | Security Management | Review Clients Security and Evacuation Plan, identify any deficiencies and communicate to the CM<br><br>Develop a Company Site Evacuation Plan, that aligns with the Client | At the earliest opportunity on site<br><br>At the earliest opportunity on site | Company HSE Manager in consultation with HSE Manager – HSE Group<br>Company HSE Manager |
| 8. | Performance Monitoring | Formal Inspections | Daily<br><br>Weekly | All HSE Advisors – Company and Contractors<br>CM / Line Managers and Supervisors – Company and Contractors |
| | | Audits | Monthly | Company HSE Manager |
| | | Behavioural Observations | Two per week | CM / Line Managers / all HSE Advisors and Supervisors – Company and Contractors |
| | | Review Corrective Action Register | Weekly | Company HSE Manager / CM |
| | | Monitor KPIs | Monthly | Company HSE Manager |
| | | Issue project statistics | Weekly | Company HSE Manager |
| 9. | Introduction of Hazardous Materials | Identify materials to be introduced | As soon as specification known | Company HSE Manager / CM |
| | | Conduct Chemical Reviews | Prior to arrival on site | Company HSE Manager |
| | | Monitor handling and storage<br>Review and update Hazardous Substance Register and SDS | Daily / Weekly<br>Monthly | Company and Contractor HSE personnel |
| 10. | Commissioning | Review commissioning plan<br>Review risk assessment and Isolation procedures<br>Develop training package<br>Conduct training and assessment of competency | Prior to Commissioning | Company HSE Manager / PM / CM |

| Item | Action | Method | When | By Whom |
|---|---|---|---|---|
| 11. | Transition to handover of HSE management responsibilities to Client | Prepare handover to Client | Towards completion of the Project in consultation with the Client | Company HSE Manager and Client |
| 12. | Project Closeout Report | Issue final project HSE statistics | Post-completion of Project | Company HSE Manager |

# APPENDIX C

# COMPANY REFERENCES

| Document Reference | Title |
|---|---|
| BRM-POL-001 | Fitness for Work Policy |
| BRM-POL-004 | Health, Safety, Environment and Community Relations Policy |
| BRM-PRC-003 | Health and Medical Management |
| BRM-PRC-005 | HSE Change Management |
| BRM-PRC-006 | HSE Issue Resolution |
| BRM-PRC-007 | Fitness for Work |
| BRM-PRC-009 | Risk Management |
| BRM-PRC-018 | Incident Management and Investigation |
| BRM-PRC-022 | Dust Suppression and Management |
| BRM-PRC-025 | Sewage and Effluent Management |
| BRM-PRC-030 | Spill Prevention and Control |
| BRM-PRC-031 | Contaminated Waste Management Disposal |
| BRM-PRC-038 | Non-Conformance and Corrective Action Management |
| BRM-PRC-042 | HV Isolation Procedure |
| BRM-PRC-043 | Permit to Work |
| BRM-PRC-044 | HSE Communication and Reporting |
| BRM-PRC-047 | Leadership and Commitment |
| BRM-PRC-048 | Audit, Inspection, Monitoring and Review |
| BRM-PRC-049 | Emergency Preparedness |
| BRM-PRC-050 | Isolation |
| BRM-REG-008 | Permit and Isolation Register |
| BRM-REG-011 | Corrective Action Register |
| BRM-REG-012 | Chemical Register and Inventory Record |
| BRM-GUI-001 | Mobile Work Platform |
| BRM-GUI-002 | Man Cage Guideline |
| BRM-GUI-003 | Scaffolding Guideline |
| BRM-GUI-004 | Safe Work at Heights |
| BRM-GUI-005 | Traffic Management |
| BRM-GUI-006 | Management and Operation of Mobile Plant |
| BRM-GUI-007 | Light Vehicle Use and Management |
| BRM-GUI-008 | Confined Space Entry Guideline |
| BRM-GUI-009 | Barriers and Barricading Guideline |
| BRM-GUI-010 | Cranes and Lifting Equipment Guideline |
| BRM-GUI-011 | PPE Requirements |
| BRM-GUI-012 | Management of Wild Animals, Reptiles, Insects and Birds |
| BRM-GUI-016 | Installation and Removal of Grid Mesh Guideline |
| BRM-GUI-018 | Excavation Guideline |
| HRM-GUI-L-002 | Code of Conduct |
| BRM-FRM-001 | HSE Performance Summary |
| BRM-FRM-002 | Incident Investigation Report |

| Document Reference | Title |
|---|---|
| BRM-FRM-004 | Working at Heights Permit |
| BRM-FRM-005 | Site Driving Practical Assessment |
| BRM-FRM-006 | Traffic Management Notification |
| BRM-FRM-017 | Visitor Induction Form |
| BRM-FRM-019 | Pre-Shift Meeting Record |
| BRM-FRM-020 | Weekly Toolbox Meeting |
| BRM-FRM-021 | Incident Alert |
| BRM-FRM-023 | Grid Mesh Removal Permit |
| BRM-FRM-026 | Confined Space Entry Permit |
| BRM-FRM-027 | Confined Space Assessment - Rescue Plan |
| BRM-FRM-029 | Job Hazard Analysis |
| BRM-FRM-035 | HV Isolation Permit |
| BRM-FRM-038 | Clearing Permit |
| BRM-FRM-039 | Work Box Personnel Cage Permit |
| BRM-FRM-045 | Contaminated Waste Tracking |
| BRM-FRM-046 | Crane Practical Assessment |
| BRM-FRM-047 | Excavation / Penetration Permit |
| BRM-FRM-048 | Backfill Permit |
| BRM-FRM-049 | Isolation Permit |
| BRM-FRM-050 | Hot Work Permit |
| BRM-FRM-051 | Vehicle Loading Crane Practical Assessment |
| BRM-FRM-052 | Crane Lift Study |
| BRM-FRM-065 | Light Vehicle Inspection Checklist |
| BRM-FRM-066 | Crane Inspection Checklist |
| BRM-FRM-084 | Audit and Inspection Schedule |
| BRM-FRM-086 | Corporate HSE Audit Checklist |
| BRM-FRM-092 | Behavioural Observation |
| BRM-FRM-096 | Chemical Introduction Request |
| BRM-FRM-097 | Clinic Authorisation |
| BRM-FRM-104 | Fitness for Work Testing Form |
| BRM-FRM-114 | Chemical Review Form – NFPA Classification |
| BRM-FRM-115 | Chemical Review Form – CLP/GHS Classification |
| BRM-FRM-133 | Consolidated Risk Register Template |
| BRM-FRM-144 | Crane Field Inspection |
| BRM-FRM-147 | Dropped Objects Field Inspection |
| BRM-FRM-153 | Fall Prevention Field Inspection |
| BRM-FRM-154 | First Aid Facilities Field Inspection |
| BRM-FRM-155 | Grid Mesh Removal Field Inspection |
| BRM-FRM-159 | JHA and Take 5 Field Inspection |
| BRM-FRM-176 | Weekly HSE Meeting Minutes |

| Document Reference | Title |
|---|---|
| BRM-FRM-177 | Isolation Written Assessment |
| BRM-FRM-178 | Authorised Isolator Practical Assessment |
| BRM-FRM-182 | Grid Mesh Installation Checklist |
| BRM-FRM-183 | Grid Mesh Post Installation Clearance Checklist |

POL = Policy
PRC = Procedure
GUI = Guideline
REG = Register
FRM = Form

## APPENDIX D

## EMERGENCY COMMUNICATIONS MATRIX

## EMERGENCY COMMUNICATION MATRIX

| Communication Matrix | Client – Project Director | Client – Construction Manager | Company – Manager of Projects | Company – Project Manager | Company – Construction Manager | Contractor | Emergency Services |
|---|---|---|---|---|---|---|---|
| **EMERGENCY** | | | | | | | |
| Initial responder to contact necessary emergency services (as required) | | | | | | X | X |
| Contractor to inform Company's Construction Manager | | | | | | X | |
| Company Construction Manager or Contractor instructs personnel to gather at muster point | | | | | X | X | |
| Contractor to head count personnel | | | | | X | X | |
| Company Construction Manager notifies Company Project Manager, General Manager Projects, and agreed Client representative/s | X | X | X | X | X | | |
| All clear to be verbally advised by the Company Construction Manager | | | | | X | X | X |

## APPENDIX E

## REVISION REGISTER

## REVISION REGISTER

The Company's HSE Manager is the custodian of this document, and will maintain and regularly review the document as required to assure currency.

The Company's Project Manager or Construction Manager may, at their discretion, authorise amendments of the site copy of the Plan, as may be required during the Project to confirm the practicality and relevancy of the instructions contained herein. The Company's HSE Manager will be supplied with a copy of any authorised revisions.

Any amendments prepared for inclusion in the Plan will be duly signed as authorised by the relevant manager and comply with statutory requirements.

All Contractors will be supplied a copy of any revisions that may affect their scope of works.

All authorised revisions of this document will be noted in the table below.

| Date | Rev | Details | Section | Page | Author | Authorised By |
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## APPENDIX F

## DISTRIBUTION REGISTER

## DISTRIBUTION REGISTER

The following table lists the required distribution of the Plan.

The personnel detailed below or their delegates are responsible for instructing all workers, Contractors and Sub-Contractors under their specific area of control, in the use of this Plan and for making the Plan readily available to all personnel.

The Company's Project Management Team will verify all Contractors are issued an approved copy of this HSE Plan, and a register of all issued copies will be maintained.

The register of all Contractors copies will be numbered from 7a onwards (i.e. 7a, 7b), subsequent Client copies requested and issued, will continue as 1a, 1b, etc.

| Copy Holder Details | Copy No. |
|---|---|
| Client's Representative | Copy # 1 |
| Company's Project Manager | Copy # 2 |
| Company's Construction Manager | Copy # 3 |
| Company's HSE Manager | Copy # 4 |
| Company's Site Office (general use) | Copy # 5 |
| Company's Home Office (general use) | Copy # 6 |
| Contractors | Copy # 7a, 7b > (as per register) |