**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.  
Coordinates: 29.139801521422125, 62.11374874884293

**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. The landscape is characterized by low and high hills, sand dunes, playas (Hamuns), and dry alluvial plains. The climate varies from extreme heat (up to 48°C in summer) to severe cold (down to -10°C in winter). Rainfall is low and mostly occurs during the winter months.

**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 considers 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.

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 has a responsibility to lead, monitor, support, guide, and audit Contractors on site to confirm compliance with the Project HSE standards outlined in this plan.

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

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 Plan applies to all areas of the Company’s scope of work, including:

* Design and engineering
* Planning
* Procurement
* Logistics
* Construction
* Commissioning

All stages of the Company’s scope on the Project will comply with the Company’s Plan.

**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, including any other internal indicators.

| **Key Result Area** | **Objective** | **Performance Measures and Targets** |
| --- | --- | --- |
| **Legislative Compliance** | 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. | TRIFR ≤ 2.11, Zero occupational illnesses or injuries, LTIFR 0.00, Incident reports completed and corrective actions closed out within required timeframes. |
| **Key Performance Indicators - Lead** | Contractor HSEMP. | Meets Project requirements, All workers aware of Duty of Care, Zero breaches of Fatal Risk Standard, policy, Code of Conduct and “Core Safety Rules We Live By.” |

**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 provide the minimum standard:

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

**5.1 Australian / International Standards**  
Australian Standards form the minimum basis for site construction reference, including high-risk works. Contractors will propose an equivalent International Standard or risk control strategy for approval, if Australian Standards cannot be met.

**5.2 Changes to Legislative and Other Requirements**  
The Company will monitor and report on changes to legal and other requirements during construction and commissioning. Contractors are responsible for confirming compliance with any legislative changes.

**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, safety, and environmental aspects. The HSEMS is accredited to management standards AS NZS ISO 45001:2018 (Occupational Health and Safety Management Systems) and AS NZS 14001:2016 (Environmental Management Systems).

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

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

**7.0 COMPANY VALUES**

**7.1 Lycopodium Values**  
Lycopodium has three core values:

* **Respect**: Treating others with respect in both personal and professional interactions.
* **Integrity**: Acting honestly and ethically in all actions.
* **Diligence**: Applying careful and thorough work ethics in all tasks.

These 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.

**7.2 Lycopodium Health, Safety, Environment, and Community Relations (HSEC) Policy Statement**  
The policy statement outlines the Company’s commitment to ensuring health, safety, environmental protection, and positive community relations. All Project personnel are responsible for complying with this policy. Breaches will be managed following the disciplinary procedure.

**7.3 Lycopodium Core Rules We Live By**  
Lycopodium’s "Core Rules We Live By" are designed to guide all personnel in their behavior. These include principles for safety, ethical conduct, and interaction with the local community. Any breach of these rules will be managed in accordance with the Company’s Disciplinary procedure.

**7.4 Lycopodium HSE Values and Expectations**  
These values emphasize the Company's commitment to a safe and healthy workplace. The Company expects all personnel to behave in a manner that promotes health, safety, and environmental protection, ensuring both personal and collective well-being.

**7.4.1 Safety Incentive Scheme**  
A safety incentive scheme will reward positive safety behavior and a culture that aligns with HSE values. Contractors are expected to create and implement their own plans, which must be approved by the Company.

**7.5 Lycopodium Code of Conduct**  
Workers must always demonstrate care and diligence when fulfilling their role or representing the Company or its Clients. The Company’s Code of Conduct outlines behavioral expectations, including professionalism, compliance with policies, and the importance of acting with integrity.

**7.6 Project Behaviours**  
Project personnel are expected to comply with the Company’s HSEC policy, abide by legal regulations, respect local traditions and customs, and refrain from harmful behaviors. Failure to comply with the Project behaviors will be managed in accordance with the Company’s Disciplinary procedure.

**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 the health and safety of all personnel involved in the Project. The responsibilities include:

* Actively engage in all HSE matters and champion the implementation of the HSE Management Plan.
* Appoint/manage sufficient competent persons to assist with the effective management of the HSE objectives of the Project.
* 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 through visible leadership.
* Participate in HSE audits and inspections and interact with personnel and organizations concerning improving safe work practices on site.
* Establish and maintain clear responsibility and accountability for implementing 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.

**8.2 Construction Manager**  
The Company’s Construction Manager has overall responsibility for construction of the Project and the implementation on site of the HSE Plan. 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.
* Participate in HSE audits and inspections and interact with personnel and organizations to improve safe work practices on site.
* Actively promote HSE performance objectives to the Company’s Project team and Contractors through visible leadership.
* Oversee the establishment of a practical HSE interface between contractors, enabling them to function in a safe, productive, and harmonious manner.

**8.3 Project Lead Superintendent**  
Project Leads have overall responsibility for a discipline or physical area of construction and are responsible for the implementation of the HSE Plan in their area of responsibility. Responsibilities include:

* Familiarize with the HSE Plan and individual responsibilities for its implementation.
* Actively promote HSE performance objectives within their team and associated Contractors.
* Facilitate hazard analysis and verify SWMS (Safe Work Method Statements) and JHAs (Job Hazard Analysis) for their area of construction activities.
* Enforce the Project Fitness for Work Policy and procedural requirements.

**8.4 Supervisors and Engineers**  
Field Supervisors and Field Engineers are regarded as line management representatives and share the requirements of management accountabilities. Responsibilities include:

* Be thoroughly familiar with the HSE Plan and their individual responsibilities for implementation.
* Participate in hazard evaluations and facilitate JHAs for work activities.
* Promote a HSE culture that mitigates the risk of injury and damage to personnel, equipment, environment, and heritage.
* Enforce HSE-related work rules and take action to ensure compliance.

**8.5 HSE Manager**  
The Company’s HSE Manager serves as the representative in all matters relating to HSE for the Project and will have the authority to cease work activity in the event of imminent danger. Responsibilities include:

* Provide professional HSE advice to the Company and contractor teams.
* Actively promote a HSE culture that mitigates the risk of injury and damage to personnel, equipment, environment, and heritage.
* Review emergency response plans, and monitor HSE activities.
* Issue HSE bulletins and promote communication on safety, health, environmental, and community issues.

**8.6 Lead HSE Advisor, Senior HSE Advisors**  
The Lead HSE Advisor and Senior HSE Advisors serve as the Company’s field representatives in all matters relating to HSE. Responsibilities include:

* Provide HSE advice to the Company’s Team and Contractor Teams.
* Actively promote a HSE culture.
* Coordinate HSE activities and maintain HSE records.
* Participate in incident investigations and review health, safety, and environmental programs.

**8.7 Contractor Site Managers (All Contractors)**  
Contractors are responsible for implementing their HSE plans, which must align with the Project’s HSE Plan. Responsibilities include:

* Engage in all HSE matters and ensure the implementation of the HSE Plan.
* Conduct formal HSE risk assessments for all major work activities and plant.
* Ensure risk controls are implemented and monitored for effectiveness.
* Develop and submit project-specific HSE Plans and other documentation for approval.

**8.8 Contractor Supervisors**  
Contractor Supervisors have significant impact on safety on the Project. Responsibilities include:

* Be familiar with the HSE Plan and their individual responsibilities.
* Participate in hazard evaluations and facilitate JHAs for work activities.
* Take action to optimize the safety and health of each employee under their control.
* Actively promote a HSE culture that mitigates the risk of injury and damage to personnel, equipment, and the environment.

**8.9 Workers (All)**  
All site workers are responsible for:

* Taking reasonable care for their own health and safety.
* Reporting any incident that may cause environmental harm.
* Complying with HSE policies and procedures.
* Using, caring for, and maintaining Personal Protective Equipment (PPE).
* Actively promoting a HSE culture and reporting substandard practices or conditions.

**8.10 Visitors**  
Visitors to the site are required to:

* Complete inductions as required.
* Sign the Visitor’s Register upon entering and leaving the site.
* Follow the instructions 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 process 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 who 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 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 mobilization 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 mobilizing 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 (Workplace Risk Assessment and Controls) to be created and reviewed throughout the lifespan of construction
* Plant integrity risk assessment to be prepared prior to fixed and mobile plant being mobilized to site
* Pre-mobilization 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 organizational 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 mobilization to confirm compliance with the requirements of the Mobilization 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, selection, and management. 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, such as eliminating at-risk behaviors and managing 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 truck drivers).  
The Company will pre-approve all Contractor subcontractors prior to 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, licenses, competencies, and renewal timeframes for all occupations and demonstrate how personnel mobilized to the Project have fulfilled these requirements. This will be in the format of a Training Needs Analysis or other approved format.

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

**The Contractor will ensure the following:**

* All personnel must complete a Project medical assessment, including a laboratory drug and alcohol screen, prior to requesting induction. 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 led 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 applicable 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 document ID when known) at least two weeks ahead of operational deployment (current visa holders) or one month before intended arrival in-country (for those without a current visa).

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 the 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 (Safe Work Method Statement) or JHA (Job Hazard Analysis) 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 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 the appropriate certification or license to operate/perform. Workers participating in training will be directly supervised by a competent person who is authorized 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 recognized training and assessment qualifications.
* Personnel are assessed against a recognized competency standard.

Contractors will provide and maintain a Training Matrix which identifies all training/competency undertaken by each worker. Records supporting the Training Matrix, including licenses, certificates, and assessment records, 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 mobilization
* First aid – minimum ratio of 1:25 first aid-trained personnel to workers
  + Note: All electrical workers, including trade 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 recognized/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 allowances for other training as required by the Company, such as 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 (PSI) meeting. These meetings will be held to:

* Ensure that the day's tasks are discussed, including any hazards that may be encountered.
* Reinforce HSE rules and expectations for safe work.
* Communicate any changes to procedures or new hazards.
* Encourage workers to identify potential hazards before beginning work.

**9.6.2 Toolbox Meetings**  
Toolbox meetings will be conducted on a weekly basis and may also be conducted on-site as necessary. These meetings aim to:

* Provide workers with relevant safety information for specific tasks.
* Discuss incidents or near misses and the lessons learned.
* Reinforce any safety policies, standards, and expectations.
* Encourage workers to speak up about safety concerns or hazards.

**9.6.3 Weekly HSE Meetings**  
Weekly HSE meetings will be held to review ongoing safety issues, monitor the implementation of safety measures, and address any new risks or issues that arise. These meetings will:

* Allow the HSE team to review site safety performance.
* Ensure the implementation of corrective actions where required.
* Provide a platform for discussing improvements in safety procedures.

**9.6.4 HSE Issue Resolution**  
The Contractor will establish a formal process for addressing and resolving HSE issues in a timely manner. This will involve:

* Identifying the root cause of any safety concerns or incidents.
* Determining corrective actions.
* Ensuring that solutions are communicated and implemented promptly.

**9.6.5 Right to Cease Unsafe Work**  
Workers will be reminded that they have the right to cease unsafe work. If they identify a risk to their health or safety, they are empowered to stop the work and report the hazard to their supervisor.  
The process for exercising the right to cease unsafe work will be made clear in daily meetings and reinforced by supervisors and managers.

**9.7 Leadership and Commitment**

The Company is committed to fostering a strong safety culture through visible leadership and active engagement at all levels. Leaders are expected to take responsibility for the safety and well-being of all personnel and the environment, and this commitment must be demonstrated through both actions and behaviors. All levels of leadership are responsible for leading by example, ensuring adherence to health, safety, and environmental policies, and empowering workers to participate actively in safety programs.

**Key elements of leadership and commitment include:**

* **Visible Leadership:**  
  Leaders are expected to be actively present on-site and to demonstrate their commitment to HSE through visible actions. This includes regular site visits, direct interaction with workers, and leading by example when it comes to safety practices. Leaders should actively communicate the importance of safety, not only through words but also by embodying safety values.
* **Communication of Commitment:**  
  Leaders at all levels must consistently communicate the importance of safety, health, and environmental protection. This includes regular safety briefings, toolbox meetings, and ensuring all personnel are clear on their roles and responsibilities related to HSE matters. They must set a clear expectation for all workers to take HSE seriously and to report unsafe conditions or behaviors.
* **Engagement with Workers:**  
  Leadership must actively engage with workers to gather feedback on safety concerns and to foster an environment where workers feel comfortable raising safety issues without fear of retribution. Regularly scheduled meetings, safety observations, and the encouragement of a collaborative approach to safety are essential.
* **Accountability for Safety:**  
  Leaders are held accountable for the safety performance of their teams. This includes ensuring compliance with all HSE policies, conducting safety audits, addressing non-conformances promptly, and taking corrective actions as necessary. Leaders are responsible for reviewing HSE performance metrics, identifying areas for improvement, and ensuring resources are available to implement necessary changes.
* **Commitment to Continuous Improvement:**  
  Leadership must show a commitment to continuous improvement by reviewing the effectiveness of safety practices and making improvements where necessary. This involves staying informed of new safety regulations, best practices, and technological advancements to ensure the Project maintains high standards of safety performance.
* **Training and Development:**  
  Leaders are responsible for ensuring that they and their teams are adequately trained in HSE practices. This includes both formal training programs and on-the-job mentoring. Leaders must make sure all personnel are provided with the necessary training to perform their duties safely and to contribute to the overall safety culture of the Project.

**Commitment from All Leadership Levels:**  
From top management to supervisors, every level of leadership must commit to creating and maintaining a safe and healthy working environment. This includes supporting HSE initiatives, providing the necessary resources, and prioritizing HSE in decision-making processes. Safety must be considered at every stage of the Project, from design and planning through to execution and closeout.

**9.8 Risk and Hazard Management**

Effective risk and hazard management is essential to ensure that health, safety, and environmental risks are properly controlled and minimized throughout the life of the Project. The Company has implemented a systematic approach to identify, assess, and manage risks and hazards associated with all aspects of the Project.

**Key aspects of risk and hazard management include:**

**9.8.1 Consolidated Risk Register**  
A Consolidated Risk Register will be maintained to track all identified risks throughout the Project. This register will document the nature of the risks, their likelihood, potential impacts, risk levels, and control measures. It will be updated regularly and reviewed during risk assessments, audits, and safety meetings.

**9.8.2 Workplace Risk Assessment and Controls (WRAC)**  
Workplace Risk Assessments and Controls (WRAC) will be used to assess the risks associated with specific tasks and work environments. These assessments will identify hazards, assess the risk level, and recommend control measures to reduce or eliminate the risks. The WRAC process will be regularly reviewed to ensure its effectiveness and updated as needed.

**9.8.3 Phased Process**  
The risk management process will be carried out in phases, beginning with the identification of hazards and culminating in the implementation of controls. The process includes:

* Identifying hazards at each stage of the Project.
* Assessing the risks associated with each hazard.
* Implementing appropriate controls to minimize risk.
* Monitoring and reviewing the effectiveness of the controls.

**9.8.4 Rules and Safe Work Procedures**  
The Company will develop and implement a set of rules and safe work procedures (SWPs) to ensure that all personnel understand the correct practices to follow in order to minimize risks. These procedures will be aligned with the Project’s safety standards and include guidance for safe operation, emergency response, and equipment handling.

**9.8.5 Safe Work Method Statement (SWMS)**  
Safe Work Method Statements (SWMS) will be required for high-risk activities. These SWMS will clearly define the steps to perform a task safely, the hazards associated with the task, and the control measures to mitigate those hazards. SWMS will be reviewed and approved before work commences, and workers will be trained on their contents.

**9.8.6 Job Hazard Analysis (JHA)**  
Job Hazard Analyses (JHAs) will be used to systematically evaluate the risks associated with specific tasks and activities. This process will identify hazards, assess their risk, and establish preventive actions. JHAs will be used for both routine and non-routine tasks and updated regularly to reflect any changes in processes or working conditions.

**9.8.7 Task and Behavioural Observations**  
Regular observations of task performance and worker behavior will be conducted to identify any unsafe practices or behaviors that may increase the risk of incidents. These observations will be used to provide feedback to workers and reinforce safe behaviors. Any unsafe practices identified will be addressed immediately, and corrective actions will be taken.

**9.8.8 Reko 5**  
The "Reko 5" safety initiative will be implemented as part of the Project’s risk management strategy. The initiative will focus on five critical safety areas, which are identified as high-risk activities or behaviors that could lead to severe incidents. The aim is to reduce the occurrence of these risks through awareness, education, and enforcement of safe practices.

**9.8.9 Hazard Reporting**  
Hazard reporting systems will be implemented to encourage workers to report any hazards or unsafe conditions they encounter on the site. All hazard reports will be taken seriously and investigated promptly. Corrective actions will be implemented, and workers will be informed about the measures taken to address the hazard.

**9.8.10 Fatal Risk Standards**  
Fatal Risk Standards will be established to identify and address hazards with the potential to cause fatalities. These standards will be based on industry best practices and will focus on controlling high-risk activities that pose a significant threat to life. Workers will be trained to understand and comply with these standards.

**9.8.11 Risk Management Training**  
Risk management training will be provided to all personnel to ensure that they understand the risk management process, the importance of identifying hazards, and the role they play in minimizing risks. The training will cover hazard identification, risk assessment techniques, and the application of controls to mitigate risks.

**9.9 Incident Reporting and Investigation**

Effective incident reporting and investigation are critical components of the Project's health, safety, and environmental management practices. The goal is to identify the root causes of incidents, implement corrective actions, and prevent reoccurrence, ensuring the continuous improvement of safety practices.

**Key elements of incident reporting and investigation include:**

**9.9.1 Classification of Incidents**  
Incidents will be classified according to their severity and impact, ranging from minor incidents (e.g., near misses) to major incidents (e.g., fatalities, severe injuries, environmental damage). This classification will help prioritize responses and investigations, ensuring that more serious incidents receive immediate attention. Incident classifications include:

* **Minor Incidents**: Near misses, first-aid injuries, and minor environmental impact.
* **Major Incidents**: Lost Time Injuries (LTI), significant environmental damage, and damage to critical infrastructure or property.
* **Severe Incidents**: Fatalities or life-threatening injuries, major environmental disasters.

**9.9.2 Incident Investigation Process**  
When an incident occurs, a structured investigation process will be followed to determine the root causes and contributing factors. This process will include the following steps:

* **Immediate Response**: Securing the scene, providing first aid or emergency response, and reporting the incident to the relevant authorities.
* **Incident Reporting**: Workers are required to report all incidents, no matter how minor, to their supervisor or site management immediately. A formal incident report form will be completed.
* **Investigation Team**: An investigation team will be formed, consisting of relevant personnel, such as supervisors, safety officers, and subject matter experts. The team will be tasked with gathering information and conducting interviews with involved personnel.
* **Root Cause Analysis**: The team will conduct a root cause analysis (RCA) to identify the underlying causes of the incident. The investigation should identify not just the direct causes but also any system, process, or management failures that may have contributed.
* **Corrective Actions**: Based on the findings of the investigation, corrective and preventive actions will be developed to address the identified root causes. These actions will be implemented to prevent similar incidents from occurring in the future.

**9.9.3 Corrective Actions and Implementation**  
Once corrective actions are identified, they will be documented in an action plan. The action plan will outline:

* **The corrective action required** (e.g., changes to work practices, training, equipment, etc.).
* **Responsibility for implementing the action** (e.g., specific individuals or departments).
* **A timeline for completion** of the corrective actions.
* **Follow-up procedures** to verify that the actions have been effectively implemented and are preventing further incidents.

**9.9.4 Incident Investigation Report**  
A detailed report will be created following an incident investigation. This report will include:

* **A description of the incident** (including what happened, when, and where).
* **The findings of the investigation**, including the root causes and contributing factors.
* **Recommendations** for corrective actions and improvements.
* **A summary of actions taken** following the investigation, including any immediate responses and long-term preventive measures.

The Incident Investigation Report will be reviewed by management and shared with the relevant parties (including workers, contractors, and regulatory bodies, where applicable). The report will also be retained for record-keeping purposes and future reference.

**9.9.5 Incident Follow-up and Monitoring**  
After an incident investigation, it is essential to monitor the effectiveness of the corrective actions. This will involve:

* **Verifying the implementation** of the corrective actions and determining whether they have effectively mitigated the risk of recurrence.
* **Conducting audits** or inspections to ensure that new practices and procedures are being followed.
* **Reviewing incident trends** over time to ensure that safety measures are continuously improving and that new risks or concerns are promptly addressed.

**9.10 Emergency Preparation and Response**

Effective emergency preparedness and response are critical to ensuring the safety and well-being of all personnel and minimizing damage to property and the environment during an emergency situation. The Company will develop and implement a comprehensive emergency response plan (ERP) for the Project, which will be regularly reviewed and updated to address potential risks and incidents.

**Key aspects of emergency preparation and response include:**

**9.10.1 Emergency Preparedness**  
Emergency preparedness involves ensuring that all workers are familiar with the emergency procedures and that appropriate resources, equipment, and personnel are available to respond quickly and effectively to emergencies. Key activities include:

* **Identifying potential emergencies**: The Company will identify and assess potential emergency scenarios, including fire, chemical spills, natural disasters, and medical emergencies.
* **Planning for emergencies**: Detailed emergency procedures will be developed to guide the response to each identified scenario. This will include procedures for evacuation, first aid, fire response, spill containment, and coordination with external emergency services.
* **Training and drills**: Workers will be regularly trained in emergency procedures, and emergency drills will be conducted to test the response capabilities of the site. Drills will cover a variety of scenarios to ensure that personnel are prepared for different types of emergencies.

**9.10.2 Emergency Response Plan (ERP)**  
The Emergency Response Plan (ERP) will provide a structured approach to managing emergencies and outline the roles and responsibilities of personnel during an emergency. Key components of the ERP include:

* **Roles and responsibilities**: Clear designation of emergency response roles for all personnel, including emergency coordinators, first aid responders, fire marshals, and evacuation leaders.
* **Communication procedures**: Procedures for quickly notifying workers, emergency responders, and external authorities in the event of an emergency. This includes alarm systems, phone trees, and emergency contact numbers.
* **Evacuation procedures**: Detailed evacuation routes and assembly points will be designated and communicated to all workers. Emergency evacuation drills will be conducted regularly.
* **Emergency supplies and equipment**: The ERP will outline the necessary emergency supplies and equipment (e.g., first aid kits, fire extinguishers, emergency lighting) that will be available on-site. This includes regular checks to ensure that equipment is functional and well-stocked.
* **Coordination with external emergency services**: The ERP will define how the site will coordinate with local emergency services (e.g., fire, police, medical teams) during an emergency, including the provision of site maps and necessary information.

**9.10.3 Emergency Response Plan (ERP) Documents**  
The ERP document will be maintained on-site and easily accessible to all personnel. It will include:

* **Emergency procedures** for each identified risk scenario.
* **Contact details** for emergency responders, management, and external authorities.
* **Maps of the site**, evacuation routes, and assembly points.
* **Emergency equipment locations**, including first aid kits, fire extinguishers, and emergency lighting.

**9.10.4 Emergency Maps**  
Detailed maps will be posted in key areas on-site to indicate emergency routes, emergency exits, assembly points, and the locations of critical safety equipment (e.g., fire extinguishers, first aid kits). These maps will be regularly updated to reflect any changes in site layout or emergency response procedures.

**9.10.5 Emergency Evacuation Plan**  
An Emergency Evacuation Plan will be established to ensure safe and orderly evacuation in the event of an emergency. The plan will include:

* **Evacuation routes**: Clearly marked evacuation routes will be provided for all areas of the site.
* **Assembly points**: Pre-designated assembly points will be established where personnel will gather to be accounted for after evacuating the site.
* **Evacuation procedures**: Workers will be trained on the steps to follow in the event of an evacuation, including how to assist others and ensure their own safety.

**9.10.6 Emergency Response Personnel**  
A designated team of emergency response personnel will be trained and assigned to manage different aspects of an emergency. This team will include:

* **First aid responders**: Personnel trained to provide medical assistance in the event of an injury or health emergency.
* **Fire marshals**: Personnel responsible for managing fire safety, including responding to fires and coordinating fire evacuations.
* **Evacuation leaders**: Personnel responsible for leading the evacuation and ensuring that all workers are accounted for.

**9.10.7 Emergency Response Training and Drills**  
All personnel will receive training in emergency response procedures as part of their site induction. Regular emergency response drills will be conducted to test the site’s preparedness and ensure that all personnel are familiar with the procedures. Drills will include:

* **Fire drills**: To ensure that all workers can evacuate the site safely in the event of a fire.
* **First aid drills**: To ensure that workers can provide appropriate first aid in medical emergencies.
* **Chemical spill drills**: To practice the containment and cleanup of hazardous material spills.

**9.10.8 Emergency Equipment**  
The site will be equipped with necessary emergency response equipment, including:

* **Fire extinguishers** and fire suppression systems.
* **First aid kits** with supplies for treating common injuries.
* **Spill containment materials** for hazardous material spills.
* **Emergency lighting** for evacuation during power outages.

**9.10.9 Medical Emergency Response Plan (MERP)**  
A separate Medical Emergency Response Plan (MERP) will be established to address medical emergencies, including severe injuries or illnesses. The MERP will outline:

* **Medical treatment protocols**: Procedures for providing first aid and arranging for medical transportation if required.
* **Medical facilities on-site**: Locations of first aid stations and arrangements for emergency medical treatment.
* **Coordination with local hospitals**: Procedures for coordinating with nearby medical facilities and ensuring workers receive prompt medical care if needed.

**9.11 Personal Electronic Devices**

The use of personal electronic devices (PEDs) on the Project site will be managed to ensure that they do not pose a safety risk or interfere with work activities. The following guidelines will be in place:

* **Restricted Areas**: The use of PEDs (such as mobile phones, tablets, and laptops) will be prohibited in specific areas where they may pose a risk to safety or hinder productivity, such as during high-risk activities or in hazardous zones.
* **Safe Use**: Where allowed, the use of PEDs must be in a safe manner, ensuring they do not distract from the task at hand or cause accidents. Workers are required to remain focused on their tasks and maintain situational awareness.
* **Charging of Devices**: PEDs must be charged in designated areas only, using approved charging equipment, to prevent electrical hazards.
* **Emergency Use**: In the event of an emergency, PEDs may be used for communication, provided it does not compromise safety or delay the emergency response.
* **Monitoring**: Supervisors will be responsible for monitoring and ensuring that PEDs are used appropriately in accordance with the Project’s safety procedures.

**9.12 Change Management**

Effective change management is essential for maintaining the safety and efficiency of the Project. Changes to processes, procedures, personnel, or the environment can introduce new risks or hazards that must be properly managed. The Company will implement a structured change management process to ensure that changes are systematically assessed, communicated, and controlled.

**Key elements of change management include:**

* **Change Identification**: Any proposed change to the Project scope, processes, or systems that could impact health, safety, or the environment must be identified and reported. This includes changes in work methods, equipment, personnel, or regulatory requirements.
* **Risk Assessment**: Before implementing any change, a risk assessment will be conducted to identify potential hazards or risks associated with the change. The assessment will consider the impact of the change on current processes, equipment, safety procedures, and personnel.
* **Approval Process**: All proposed changes must be reviewed and approved by relevant stakeholders before implementation. This includes senior management, HSE representatives, and other departments affected by the change. The change management approval process will ensure that all potential risks are considered and that necessary control measures are put in place.
* **Communication of Changes**: Once a change is approved, it must be communicated clearly to all affected personnel. This will include updating procedures, safety plans, training materials, and any other relevant documentation. Workers will be informed about the change and any new responsibilities or procedures.
* **Implementation of Changes**: The change will be implemented following a planned approach, ensuring that any new systems or procedures are integrated smoothly into the existing operations. Adequate resources will be allocated to manage the change, and personnel will be trained if necessary.
* **Monitoring and Review**: After the change has been implemented, its effectiveness will be monitored. Feedback from workers and supervisors will be used to assess whether the change has introduced any new risks or issues. Regular reviews will ensure that the change is functioning as expected and that corrective actions are taken if necessary.
* **Document Control**: All changes will be documented and tracked in the change management system. This includes updating project plans, procedures, and safety protocols to reflect any changes. The documentation will serve as a record of the change process and ensure compliance with regulatory and company requirements.

**10.0 Occupational Health, Hygiene, Monitoring and Wellbeing**

The health and wellbeing of all workers are of paramount importance on the Project. The Company is committed to creating a work environment that supports the physical and mental health of all personnel. Effective management of occupational health, hygiene, and wellbeing will ensure that workers are fit to perform their tasks safely and without risk to themselves or others.

**Key elements of occupational health, hygiene, and wellbeing include:**

**10.1 Occupational Health Programs**  
The Company will implement occupational health programs to prevent and manage health risks associated with the work environment. These programs will address common workplace health issues such as heat stress, noise exposure, and ergonomic risks. Key components of these programs include:

* **Pre-employment medical examinations**: All workers will undergo medical assessments prior to mobilization to ensure they are fit for the tasks they will perform. This includes assessments for physical fitness, hearing, vision, and any underlying health conditions that may affect work performance or safety.
* **Periodic health checks**: Workers will be required to undergo periodic health assessments throughout the Project to monitor for any emerging health issues.
* **Health surveillance**: For certain high-risk activities (e.g., working with hazardous substances), health surveillance will be conducted to detect early signs of ill health.

**10.2 Hygiene Management**  
Hygiene management will be a critical focus to ensure a safe and healthy working environment. The Company will implement a comprehensive hygiene program to minimize the risk of illness and exposure to hazardous materials. Key components include:

* **Personal protective equipment (PPE)**: Appropriate PPE, such as gloves, masks, and protective clothing, will be provided and used by workers to minimize exposure to hazardous substances and physical agents.
* **Sanitation and cleaning**: Clean and sanitary facilities will be provided on-site, including clean drinking water, food preparation areas, and restroom facilities. Regular cleaning and disinfection of these facilities will be conducted to prevent the spread of disease.
* **Waste management**: A waste management system will be in place to ensure that hazardous waste and non-hazardous waste are separated, stored, and disposed of in a safe and compliant manner.

**10.3 Mental Health and Wellbeing**  
The mental health and wellbeing of all personnel will be actively supported throughout the Project. Mental health challenges such as stress, fatigue, and anxiety can impact both individual wellbeing and workplace safety. The Company will establish a mental health program that includes:

* **Employee assistance programs (EAP)**: Workers will have access to confidential counseling and support services to assist with mental health issues, stress, and personal challenges. These services will be available to all personnel on-site.
* **Wellness programs**: Wellness programs will be introduced to encourage healthy behaviors, such as exercise, proper nutrition, and stress management techniques. These programs may include fitness activities, health screenings, and workshops on mental health awareness.
* **Fatigue management**: A fatigue management program will be implemented to minimize the risk of accidents and errors caused by fatigue. This includes ensuring adequate rest periods, controlling work hours, and monitoring the health status of workers who may be at risk of fatigue.

**10.4 Health Monitoring and Reporting**  
Continuous health monitoring will be conducted to ensure that workers are not exposed to harmful conditions and that any health concerns are identified and addressed promptly. This includes:

* **Monitoring for exposure to harmful agents**: Regular monitoring of the work environment will be conducted to detect and measure exposure to harmful physical agents (such as noise, heat, and vibration) and hazardous substances (such as chemicals and dust).
* **Medical surveillance**: Workers exposed to certain risks will undergo medical surveillance, including tests for exposure to harmful substances, noise-induced hearing loss, and respiratory conditions. The results of these tests will be documented, and any necessary interventions will be carried out.

**10.5 Health and Safety Training**  
All workers will be trained on the risks associated with their work and the measures they must take to protect their health and safety. Health and safety training will include:

* **Induction training**: All workers will receive induction training covering health and safety protocols, emergency procedures, and specific risks associated with their tasks.
* **Ongoing training**: Workers will participate in ongoing health and safety training throughout the Project, including refresher courses and training on new risks or procedures as they arise.
* **Mental health awareness**: Training on mental health awareness, recognizing signs of stress or mental health issues, and knowing where to seek help will be provided to both workers and supervisors.

**10.6 Emergency Health Response**  
An emergency health response plan will be in place to provide immediate medical assistance in the event of a health emergency. Key components of the plan include:

* **First aid and medical personnel**: First aid kits and trained medical personnel will be available on-site to provide immediate assistance to injured or ill workers.
* **Emergency medical facilities**: Emergency medical facilities will be provided, including an onsite medical room with necessary equipment, and arrangements will be made with local healthcare providers for more serious cases that require advanced treatment.
* **Evacuation to medical facilities**: Procedures will be in place for the safe and swift evacuation of injured or ill workers to local hospitals or medical centers, as necessary.

**10.7 Reporting Health Issues**  
All health-related issues, including work-related illnesses, injuries, and near-misses, must be reported promptly to supervisors and the HSE department. A system for reporting and tracking health issues will be established to ensure appropriate follow-up and resolution. This system will also facilitate the identification of trends and potential risks to worker health.

**10.8 Fitness For Work**

Ensuring that all personnel are fit for work is a key component of the health and safety program on the Project. Fitness for Work (FFW) refers to a worker’s physical and mental ability to safely perform their tasks without risk to themselves or others. The Company will establish and enforce policies and procedures to ensure that workers meet the necessary fitness standards and are capable of working safely in the designated environment.

**Key elements of the Fitness for Work program include:**

**10.8.1 Pre-Employment Medical Assessments**  
Before workers are mobilized to the Project site, they will be required to undergo a pre-employment medical assessment. This assessment will evaluate the worker’s physical and mental fitness for the tasks they are required to perform, ensuring they do not have any underlying medical conditions that may compromise their ability to work safely.

* **Medical Exam**: The pre-employment medical exam will include assessments of key health factors, such as vision, hearing, cardiovascular health, musculoskeletal conditions, and any other conditions that may affect work performance.
* **Fitness to Perform Duties**: The medical exam will assess whether the worker is capable of performing the tasks associated with their role, including lifting, operating machinery, working in extreme temperatures, and other site-specific risks.

**10.8.2 Ongoing Health Monitoring**  
All workers will be subject to ongoing health monitoring throughout the duration of their employment on the Project. This is to ensure that any changes in their health status are detected early and that they continue to meet the fitness standards required for safe work performance.

* **Periodic Health Checks**: Workers may be required to undergo periodic health assessments to monitor any changes in their physical or mental health, particularly for those involved in high-risk activities.
* **Medical Surveillance**: In high-risk areas, workers may be subject to medical surveillance to detect the onset of conditions that could be related to work activities, such as respiratory conditions from exposure to dust or hearing loss due to noise exposure.

**10.8.3 Alcohol and Drug Testing**  
The use of alcohol or drugs on-site can significantly impair a worker’s ability to perform tasks safely. The Company will enforce a strict alcohol and drug policy to ensure all workers are fit for work.

* **Random and Scheduled Testing**: Random and scheduled drug and alcohol testing will be conducted on-site to ensure that workers are not impaired while performing work-related duties. Any worker found to be under the influence of alcohol or drugs will be immediately removed from site and may face disciplinary action.
* **Post-Incident Testing**: In the event of an accident or near-miss, drug and alcohol testing will be conducted to determine if impairment was a factor.

**10.8.4 Mental Health and Wellbeing**  
Fitness for Work is not only concerned with physical health but also mental health. Workers experiencing mental health issues such as stress, anxiety, or depression may not be fit to work safely and effectively. The Company will provide support to workers experiencing mental health difficulties.

* **Mental Health Screening**: Workers may be assessed for mental health issues as part of the ongoing health monitoring program. If necessary, workers will be provided with access to counseling services, Employee Assistance Programs (EAP), or other support mechanisms.
* **Managing Stress and Fatigue**: The Company will implement a fatigue management program to ensure workers are not subjected to excessive work hours, which could impair their ability to work safely. Workers will be encouraged to report any feelings of stress or fatigue that may affect their ability to work.

**10.8.5 Return to Work Procedures**  
In the event that a worker is injured or becomes unfit for work due to illness, a formal return to work procedure will be followed to ensure they are fit to resume their duties safely. This procedure will include:

* **Medical Clearance**: Workers must obtain medical clearance from a qualified healthcare provider before returning to work. The medical provider will assess the worker’s fitness to resume their previous tasks or determine if alternative duties are required.
* **Gradual Return**: Workers returning from injury or illness may be phased back into their work duties through a graduated return-to-work program, ensuring they are not overwhelmed by the physical or mental demands of their role.

**10.8.6 Responsibilities of Workers**  
It is the responsibility of all workers to ensure that they are fit for work. Workers must:

* **Disclose health conditions**: Report any health issues or conditions that may affect their ability to work safely.
* **Seek medical attention**: Seek medical attention if they feel unwell or unable to perform their duties safely.
* **Follow wellness guidelines**: Follow health and wellness guidelines provided by the Company to maintain physical and mental fitness for work.

**10.8.7 Supervisors and Managers**  
Supervisors and managers are responsible for monitoring the fitness of workers under their supervision. They must:

* **Observe workers for signs of impairment**: Look for signs that workers may not be fit for work, including physical fatigue, mental fatigue, or impairment due to alcohol or drugs.
* **Take appropriate action**: If a supervisor believes that a worker is not fit for work, they should take appropriate action, which may include sending the worker for medical evaluation or referring them for counseling or support services.

**10.9 Ergonomics and Manual Handling**

Ergonomics and manual handling are critical components of the health and safety management system for the Project. The Company is committed to reducing the risk of musculoskeletal injuries and other health issues associated with poor ergonomics and manual handling tasks. This includes providing workers with the necessary tools, training, and procedures to carry out their tasks in a safe and efficient manner.

**Key elements of ergonomics and manual handling management include:**

**10.9.1 Ergonomic Assessments**  
Ergonomic assessments will be conducted to evaluate the physical demands of tasks and to identify potential risks for workers. These assessments will focus on optimizing workstations, tools, and tasks to reduce strain and injury risk. Key components of ergonomic assessments include:

* **Workstation Design**: Ensuring that workstations are designed to minimize awkward postures, repetitive movements, and strain. This includes adjusting the height and position of work surfaces and equipment.
* **Tool Selection**: Selecting and providing tools that are designed to reduce force and vibration, while promoting neutral body postures. Ergonomically designed tools will be made available for tasks such as lifting, handling, and assembly work.
* **Task Analysis**: Assessing tasks to determine if they require high levels of physical effort, awkward postures, or repetitive motions that could lead to musculoskeletal disorders (MSDs). Tasks that present risks will be modified to minimize these hazards.

**10.9.2 Manual Handling Training**  
All workers involved in manual handling tasks will receive training on safe manual handling practices. This training will cover:

* **Proper Lifting Techniques**: Workers will be trained to lift loads correctly by using their legs rather than their back and avoiding twisting motions.
* **Team Lifting**: When loads are too heavy to be lifted by one person, workers will be trained to use team lifting techniques or mechanical aids such as lifting equipment.
* **Use of Mechanical Aids**: Workers will be trained in the use of mechanical aids (e.g., cranes, forklifts, hoists, trolleys) to assist with heavy lifting and to reduce the physical strain on workers.
* **Awareness of Risk Factors**: Workers will be educated about the risks of improper manual handling, including the potential for back, shoulder, and neck injuries, as well as repetitive strain injuries (RSIs).

**10.9.3 Risk Assessment for Manual Handling Tasks**  
A formal risk assessment will be conducted for all manual handling tasks to identify hazards and implement control measures. The risk assessment will consider factors such as:

* **Weight of the Load**: Heavier loads are more likely to cause injury and will be managed through mechanical assistance or team lifting.
* **Frequency of the Task**: Tasks that involve repetitive lifting or handling will be identified and modified to reduce strain on workers.
* **Distance and Reach**: Tasks that require workers to carry loads over long distances or awkward distances will be assessed for risk and, where necessary, changed to prevent strain.
* **Posture and Positioning**: Tasks requiring workers to bend, twist, or reach overhead will be modified to reduce the risk of musculoskeletal injury.

**10.9.4 Manual Handling Guidelines**  
To further reduce the risk of injury, the Company will provide manual handling guidelines that detail safe practices for various tasks. These guidelines will cover the proper techniques for lifting, carrying, pushing, and pulling, and will be included in the training and inductions for all personnel involved in manual handling tasks.

**10.9.5 Control Measures for High-Risk Tasks**  
For high-risk manual handling tasks, additional control measures will be implemented. These measures may include:

* **Job Rotation**: Implementing job rotation to limit the amount of time workers spend on high-risk tasks, reducing the likelihood of repetitive strain injuries.
* **Mechanical Assistance**: Using hoists, lifts, or other mechanical aids to handle heavy or awkward loads, minimizing the need for workers to manually lift or carry loads.
* **Rest Breaks**: Providing regular rest breaks to workers engaged in repetitive or physically demanding manual handling tasks to reduce fatigue and the associated risk of injury.

**10.9.6 Post-Injury Rehabilitation and Return to Work**  
In the event of a musculoskeletal injury or strain, the Company will support affected workers through a return-to-work program. This program will include:

* **Medical Evaluation**: Workers who suffer manual handling injuries will be evaluated by a medical professional to determine the severity of the injury and the appropriate course of action.
* **Rehabilitation Program**: Workers will be provided with access to rehabilitation services, including physical therapy or chiropractic care, to help them recover and return to work safely.
* **Modified Duties**: If necessary, workers may be temporarily assigned to modified duties to accommodate their injury and prevent further strain. This may include lighter or less physically demanding tasks.