



COMPANY POLICIES MANUAL

Document Number: HSE-MAN-001

Revision	Description	Issue Date	Review	Authorised
1	Re-written and re-formatted.	03/10/2017	David Beros	
2	Reviewed	03/10/2017	Rob Oliver	
3	Reviewed	03/10/2017	Glen Payne	
4	Reviewed	09/10/2017	Rob Oliver	Glen Payne
5	Reviewed	22/08/2018	Stuart Bow / David Beros	Glen Payne

1. Introduction

DIAB Engineering is committed to providing a safe and healthy work environment for all employees, contractors, visitors and 3rd party personnel.

The Chief Executive Officer provides the necessary leadership and direction of the Company including the values and principles by which it operates.

The Policy Statements contained within this manual are available to the general public, demonstrating our commitment to the occupational health and safety of our employees; the protection of our environment and the quality objectives and principles by which we deliver our services to our customers.

We promote a strong culture of health and safety in our day to day operations and take a positive initiative in conserving our resources and protecting the environment.

The Company Policies are reviewed periodically by our Management Team to ensure its effectiveness and consistency with the evolving changes of legislation within our scope of work and consistency in the quality of services we deliver to our client.

2. Purpose

The Policy Statements issued by the Group Risk Manager communicates and supports the Company's commitment in providing services to internationally recognised standards in compliance with applicable industry statutory rules and regulations.

The Policy Statements outline DIAB Engineering's values and expectations in upholding these standards and the company's commitment to continually improve the effectiveness of our Quality, Health, Safety and Environmental systems and processes.

3. Responsibilities

3.1 Chief Executive Officer

The Chief Executive Officer shall establish policies on key aspects of the Company's principles, values, objectives and standards by issuing policy statements.

Conduct a periodic review of each policy (no greater than 2 years) to ensure that it is appropriate and reflects the true nature of the business.

Communicate Company Policies to all employees and make available to the general public.

3.2 Group Risk Manager

Facilitate the distribution of Company Policies to all personnel both internal and external customers. Promote and uphold Company Policies.

4. Company Policies

Company Policies are signed by the Chief Executive Officer.

Each Policy is controlled by the signature date.

These Policies are reviewed periodically but no longer than two years at scheduled Management Review Meetings to ensure that they remain appropriate to the business.

Signed copies of these Policies are displayed at the DIAB Engineering office / facilities reception area, posted in workshop/crib rooms and accessible to employees through the Skytrust Documents Library.

Policies are re-enforced during Company Induction presentations and In-House Training Programs

The Company Policies shown in Appendix 'A' have been issued by the Group Risk Manager.

5. References

Location – DIAB Engineering Reference Library

Document	Title
International Standards	ISO 9001:2015
	OHSAS 18001:2007
	ISO 14001:2015

6. Appendices

Appendix 'A' – Company Policies

The following Company Policies are attached to this manual in Appendix A and available through Skytrust Documents Library.

Appendix #	Policy Number	Title
1.	HSE-POL-001-001	Risk Management Policy
2.	HSE-POL-001-002	Indigenous Policy
3.	HSE-POL-001-003	Fatigue Management Policy
4.	HSE-POL-001-004	Drugs, Alcohol and Smoking Policy
5.	HSE-POL-001-005	Fitness for Work Policy
6.	HSE-POL-001-006	Equal Opportunity Policy
7.	HSE-POL-001-007	Dimension and Loading Management Policy
8.	HSE-POL-001-008	HVA Maintenance Management Policy
9.	HUR-POL-001-003	Missed Flights Policy
10.	HUR-POL-001-004	Electronic Communications & Social Media Policy
11.	HUR-POL-001-006	Workplace Bullying Prevention Policy
12.	HUR-POL-001-007	Discipline Policy
13.	MGT-POL-001-001	Quality Policy
14.	MGT-POL-001-002	OHS Policy
15.	MGT-POL-001-003	Environmental Policy
16.	MGT-POL-001-006	Injury Management Policy
17.	MGT-POL-001-007	Union Right of Entry Policy
18.	MGT-POL-001-008	Corporate Social Responsibility Policy
19.	MGT-POL-001-009	Anti-Bribery and Corruption Policy

RISK MANAGEMENT POLICY

DIAB Engineering is focused on providing a safe, disciplined and reliable workplace and we are committed to effective risk management. We will include risk identification and management into all our activities, making it a core part of our culture.

Our objective is to manage risks and hazards in the workplace and to identify and remove potential and recognised risks to achieve zero harm in the workplace.

We will achieve this through:

- Implementing an integrated risk management approach which uses risk assessment as an integral part of decision making and planning.
- Ensuring that appropriate risk controls are developed, implemented and maintained.
- Complying with all applicable regulation and legislation, internal policies and contractual obligations.
- Ensuring that procedures are in place to identify and report on hazards, including identifying possible foreseeable situations where employees may be exposed to injury, illness or disease.
- Ensuring that procedures are in place to evaluate and assess risk.
- Providing relevant and timely training to all employees.
- Monitor and review the performance of our risk management system.
- Maintaining appropriate insurance cover.

This policy applies to all DIAB Engineering employees and subcontractors. The policy and associated group risk management processes will be applied across all facets of the company.



Glen Payne

Chief Executive Officer
DIAB Engineering Pty Ltd

INDIGENOUS POLICY

DIAB Engineering respects the heritage, traditions, culture and rights of Indigenous people. We are committed to fostering our relationship with the Traditional Owners of the land on which we work.

DIAB Engineering recognises the relationship Indigenous people have with the land and sea and respect that worksites may contain sacred sites that require protection. We will ensure that our employees are aware of these sacred sites and that they understand their responsibilities to protect them.

DIAB Engineering's objective is to be a company of choice for Indigenous people.

We will achieve this by:

- Promoting and providing employment opportunities, training and integration of Indigenous people within all aspects of our business.
- Improving our Indigenous recruitment process and ensuring that selection processes are culturally sensitive.
- Ensuring that all employees are trained in the understanding of Traditional Ownership and cultural heritage.

DIAB Engineering will follow any guidance given by the Indigenous Community through consultation and host companies who have undertaken Cultural Heritage Audits. This includes specific areas of training in our clients' Safety Environment Management Plans.

This policy is reinforced through training and consultation with Traditional Owners.

DIAB'S commitment to continuous improvement ensures that the above policy is reviewed on a regular basis.



Glen Payne

Chief Executive Officer
DIAB Engineering Pty Ltd

FATIGUE MANAGEMENT POLICY

Diab Engineering is committed to providing a safe place of work for all employees, subcontractors and visitors to site and achieving zero harm to personnel. We understand fatigue is a considerable risk and as such are committed to achieving zero harm to personnel due to the effects of fatigue.

Diab Engineering will actively prevent and manage risk associated with fatigue in the workplace through the following strategies:

- Ensuring a system is in place to recognise fatigue related risk associated with the business in general, and with specific projects.
- Provide a system to implement controls to manage fatigue risks in the workplace.
- Ensuring systems are in place to manage fatigue-related risk associated with working conditions. In particular shift duration, roster systems, accommodation and travel arrangements.
- Compliance with all relevant legislative and client specific requirements.
- Providing appropriate information and communicate openly with employees and clients on fatigue related issues.
- Ensuring employees understand their right and obligation to cease work if they believe fatigue is compromising the safety of themselves or others.
- Ensuring all employees, sub-contractors and visitors are informed of, and understand their obligations, under this policy.

DIAB Engineering is responsible for establishing and maintaining a fatigue management framework to ensure that personnel are fit for duty.

All employees and subcontractors are responsible for ensuring they are fit for duty by complying with this Policy.

To successfully control the risks associated with fatigue in the workplace it is up to each individual to recognise the symptoms of fatigue, obtain adequate sleep and ensure they and others affected by fatigue seek assistance.



Glen Payne

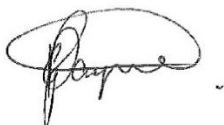
Chief Executive Officer
Diab Engineering Pty Ltd

DRUGS, ALCOHOL AND SMOKING POLICY

Diab Engineering is committed to achieving a drug and alcohol free workplace, as well as ensuring personnel are not impacted by the cigarette smoke of others.

Diab Engineering is dedicated to:

- A zero tolerance for drugs and alcohol in the workplace, and a zero tolerance of inconsiderate cigarette smoking behaviour.
- Ensuring the workplace is free from personnel under the influence of drugs and alcohol.
- Providing systems to ensure testing is conducted and employees are able to report personnel suspected of being under the influence of drugs and alcohol.
- Providing a system of disciplinary action and employee assistance following positive testing.
- Providing a system to ensure employees choosing to smoke cigarettes do not impact other employees.
- Compliance with all relevant legislative and client specific requirements.
- Providing appropriate information, instruction and training to employees to ensure they understand the effects of alcohol and drugs, and the impact of passive smoking.
- Ensuring all employees, sub-contractors and visitors are informed of, and understand their obligations, under this policy.



Glen Payne

Chief Executive Officer
Diab Engineering Pty Ltd

FITNESS FOR WORK POLICY

DIAB Engineering cares about the health and safety of all employees, contractors and visitors and is committed to creating and maintaining a safe work environment.

To meet our duty of care obligations we will ensure a healthy and safe working environment through effective risk management and implementing systems and procedures to assist employees perform their tasks safely and efficiently.

We will achieve this through:

- Promoting physical, mental and emotional health to enable employees to safely undertake and sustain work activities.
- Providing training and resources and ongoing communication to improve fit for work awareness.
- Ensuring the workplace is free from personnel under the influence of drugs and alcohol.
- Taking all practicable steps in rostering and placement of employees to ensure the hours of work, shifts and rosters and workplace conditions do not create unacceptable risk.
- Ensuring employees are fit for work and providing assistance and providing support to help overcome problems likely to impair fitness for work.
- Provision of effective, fair and constructive procedures to deal with people who are unfit for work.
- Ensuring all employees, sub-contractors and visitors are informed of, and understand their obligations, under this policy.
- Monitoring and reviewing the effectiveness of the fitness for work policy and procedure to bring about continual improvement.

DIAB Engineering manager's will ensure that this policy is communicated throughout the business and that all policies and procedures are reviewed regularly.



Glen Payne

Chief Executive Officer
DIAB Engineering Pty Ltd

EQUAL OPPORTUNITY POLICY

DIAB Engineering is committed to creating and maintaining equal opportunity at our workplaces.

We respect and value the diversity of the work force and recognize our moral and legal responsibilities to provide an equal opportunity workplace.

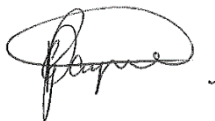
We provide an equal employment opportunity policy for all employees without discrimination, against race, age, gender, religion, sexual preference, marital status, family responsibilities, pregnancy, disability or impairment, political opinion, national extraction or social origin.

We will do this by:

- Ensuring that all recruitment, selection and promotion decisions are based on the best qualified and experienced candidate who can perform the genuine occupational requirements of the position.
- Providing equal opportunity in employment to all suitably able people without discrimination or harassment based on personal characteristics.
- Ensuring employees are treated fairly and equitably in an environment free of bullying, harassment and sexual harassment.
- Fostering an environment where all employees feel safe and valued, regardless of their background.
- Recognising and valuing cultural diversity as an asset that enriches the life of the working community.
- Educating all employees about issues of racism, equity and equal opportunity.

All DIAB Engineering employees are responsible for ensuring that equal opportunity principles are respected.

DIAB Engineering's managers will ensure that this policy is communicated throughout the business and that all policies and procedures are reviewed regularly



Glen Payne

Chief Executive Officer
DIAB Engineering Pty Ltd

DIMENSION AND LOADING MANAGEMENT POLICY

DIAB Engineering is committed to providing a safe and reliable transport service in alignment with the requirements of our WA Heavy Vehicle Accreditation responsibilities. DIAB Engineering understand, the need to ensure that all of our transport vehicles entering the public road system are compliant with regulatory requirements in regard to load, mass and dimensions.

To ensure that this operation meets this policy in all respects, DIAB Engineering will put systems and controls in place to ensure that all loads and vehicle configurations are checked before they enter the public road system. DIAB Engineering will comply with the five Dimension and Loading management standards: responsibilities, vehicle loading, records and documentation, internal review and training and education.

To achieve a safe and reliable transport service, DIAB Engineering will work in compliance with the requirements of our detailed procedures as outlined in the HSE-PLA-001-006 - WA Heavy Vehicle Accreditation System.



Glen Payne

Chief Executive Officer
DIAB Engineering Pty Ltd

HVA MAINTENANCE MANAGEMENT POLICY

DIAB Engineering is committed to providing a safe and reliable transport service in alignment with our commitment to achieving zero harm to personnel and the environment.

DIAB Engineering understands, the need to maintain safe, reliable and roadworthy vehicles through a suitably planned and executed maintenance program in accordance with Western Australian Heavy Vehicle Accreditation requirements.

The DIAB Engineering Maintenance Management Program is structured on and adheres to the requirements of Western Australian Heavy Vehicle Accreditation. DIAB Engineering will comply with the eight maintenance management standards: daily vehicle checks, scheduled vehicle servicing, responsibilities, records and documentation, internal review, training and education, effective fault reporting, identifying priorities and repair of faults.

When operating under HVA permit, DIAB Engineering will only use vehicles that are covered by a Maintenance Management System meeting Western Australian Heavy Vehicle Accreditation requirements.

To achieve a safe and reliable transport service, DIAB Engineering will work in compliance with the requirements of our detailed procedures as outlined in HSE-PLA-001-006 - WA Heavy Vehicle Accreditation System.



Glen Payne

Chief Executive Officer
DIAB Engineering Pty Ltd

MISSED FLIGHTS POLICY

It is DIAB Engineering's intent to allow for adequate airfare travel for employees who are required to travel long distance for DIAB Engineering business.

Where an employee fails to board their scheduled flight, without appropriate notice, it results in significant disruption at the work site and substantial expense to DIAB Engineering, including loss of the pre-paid fare and the administration costs of re-scheduling the flight and work roster.

The purpose of this Policy is to define appropriate procedures, and disciplinary action, for employees missing their scheduled flights.

It is the responsibility of all employees to:

- Check in at the airport at least 60 minutes prior to the scheduled flight departure.
- Provide forty eight (48) hours notice of a flight cancellation.
- Provide an acceptable reason to their Supervisor / Manager for the cancellation.
- Notify their Supervisor / Manager as soon as practicable in the event of injury or illness, and the expected duration of the absence.
- Provide a medical certificate, or other evidence satisfactory to DIAB Engineering, to support the reason for missing the flight.

Where the evidence provided by the employee is not acceptable to DIAB Engineering, appropriate disciplinary procedures will be instigated. This may include, but is not limited to:

- Deduction from wages for the cost of the booked flight if the flight is unable to be reclaimed, without additional expense, at another date.
- Nonpayment for any hours not worked due to a missed flight.
- Suspension of employment, without payment, until another flight is available.

DIAB Engineering reserves the right to deduct the cost of a booked flight from an employee's final pay if the employment ends as a result of the employee resigning whilst absent from site on R&R without providing the required notice period.



Glen Payne

Chief Executive Officer
DIAB Engineering Pty Ltd

ELECTRONIC COMMUNICATIONS & SOCIAL MEDIA POLICY

DIAB Engineering is committed to a comprehensive strategy for proper and effective use of computer, internet and e-mail facilities. This includes:

- Effectively using computer resources in a way that complies with legal and ethical standards.
- Maintaining the security of company computer resources.
- Appropriately using e-mail and access to internet resources.
- Respecting copyright and intellectual property laws and protocols.

E-mail and internet activities are to be confined to DIAB Engineering business related activities.

E-mail and Internet communication originating from DIAB Engineering employees or representatives must never contain inflammatory, harassing or defamatory language, and must not be disruptive to the operations, or convey any material which would reflect poorly on DIAB Engineering's reputation or its general public image.

English is the official language of Australia and is therefore the preferred method of electronic communication for all DIAB Engineering's business activities. All correspondence must be made in English when communicating in the workplace by email, letters and reports.

DIAB Engineering prohibits any use of these resources for purposes that are deemed to be:

- Unlawful, unethical or inappropriate
- An unauthorised commercial activity
- Discriminatory
- Harassing or intimidating

Limited personal use of computer resources may be approved by the CEO provided such usage is not in breach of this policy, or disruptive to performance or work colleagues.

DIAB Engineering has the right to monitor and audit any use of its computing and communication networks and to access or retrieve any material or data that is accessed, stored or transmitted on or via these networks. Guidance regarding electronic communications & social media use is contained in the DIAB Engineering Employee Manual.



Glen Payne

Chief Executive Officer
DIAB Engineering Pty Ltd

WORKPLACE BULLYING PREVENTION POLICY

Diab Engineering is committed to providing and maintaining a safe work environment where everyone is treated with fairness, respect, equality and dignity.

Behaviours involving bullying, harassment and discrimination are against the Diab Engineering values and pose a risk of injury or harm to employees and will not be tolerated.

Notwithstanding, any person who claims to have experienced discrimination or harassment:

- Should not be discouraged from discussing the problem with the other party in the first instance (informal resolution) in an attempt to resolve the matter in a constructive manner.
- Is entitled to seek a formal investigation and determination of the complaint in accordance with this procedure.
- Is entitled to pursue a complaint under the provisions of the WA Equal Employment Opportunity Act 1984 or the relevant Commonwealth legislation.

Discrimination, harassment and bullying behaviour poses a significant threat to the health, safety and welfare of employees in the workplace and potentially has wider implications for employers; including reduced profitability, low morale and increased absenteeism and staff turnover. In addition, employers ultimately remain responsible for the consequences of such behaviours as a result of the employer's duty of care under common law and under the Occupational Safety and Health Act 1984 (WA).

Diab Engineering has created this policy and the associated Complaints Resolution Procedure in order to make the workplace safer for all employees and to minimise the risk to employees from such behaviour that may arise in the work environment.

This policy applies to all Diab Engineering employees, contractors and consultants including all full-time, part-time, casual and temporary employees, contractors or workers employed on a commission basis.

In order to resolve or redress any complaint about discrimination, harassment or workplace bullying, employees should use the Complaints Resolution Procedure.

Breaches of this policy may lead to disciplinary action being taken against an employee under the Diab Engineering Disciplinary Policy.



Glen Payne

Chief Executive Officer
DIAB Engineering Pty Ltd

DISCIPLINE POLICY

Diab Engineering is committed to providing a harmonious working environment for all employees and will not tolerate misconduct at any level and is therefore eager to promote orderly employment relations as well as fairness and consistency in the treatment of individuals. This policy applies to all Diab Engineering employees.

It is a key responsibility of management to take ownership of behavioural/misconduct issues and to provide appropriate actions and accountability for necessary outcomes.

Addressing misconduct issues is also imperative to Diab Engineering achieving its key business objectives.

The Diab Disciplinary Procedure provides instructions for taking disciplinary action in relation to repeated misconduct in such a way as to uphold the Diab Engineering values and ensure that employees are not treated harshly or unreasonably.

Diab Engineering has the right to expect employees:

- To carry out their duties to the best of their capabilities, and
- To abide by the terms and conditions of their conditions of employment and the rules and regulations established by Diab Engineering.

It is recognised that day to day issues relating to conduct and behaviour will be resolved by management and employees through the normal means of communication.

However, where normal communications fail to resolve matters, or matters are considered sufficiently serious and where the Disciplinary Policy and Disciplinary Procedure is deemed applicable, any resultant disciplinary action will seek to be corrective in nature, be justifiable and be aimed at achieving acceptable standards of behaviour and effective employee relations.



Glen Payne

Chief Executive Officer
DIAB Engineering Pty Ltd

QUALITY POLICY

DIAB Engineering strives to conduct our business with a total commitment to our customers and their requirements. We define quality as conformance to our customer's needs, both internal and external; and conformance to all quality requirements.

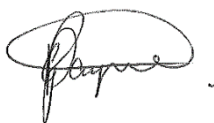
We will do this by aiming to meet or exceed our customer's expectations and continually improving our processes and systems.

We will achieve this by:

- Delivering the highest level of quality products and engineering support services.
- Ensuring that all quality management activities will contribute to achieving our quality objectives.
- Maintaining, monitoring, reviewing, auditing and continually improving our Quality Management System.
- Delivering our products and services consistently and reliably by working to documented procedures which are in accordance with ISO9001:2015, ISO17025:2005 and legislative and industry standards.
- Communicate and provide appropriate quality awareness training relative to the company's quality objectives to all our personnel in promoting their involvement and responsibility in the continuous improvement of our product and service quality
- Ensuring that all employees understand and take ownership for quality and service standards.
- Promoting quality awareness with our clients, suppliers and other key stakeholders.

The achievement of our quality objectives and continual improvement is fundamental to all activities carried out within our company and must be practiced by all employees as an integral part of their daily work.

DIAB Engineering's Management will ensure that this policy is communicated throughout the business and that all policies and procedures are reviewed regularly.



Glen Payne

Chief Executive Officer
DIAB Engineering Pty Ltd

OCCUPATIONAL HEALTH & SAFETY POLICY

DIAB Engineering strives to maintain the highest standards possible in occupational health and safety practices, including creating and maintaining a healthy and safe workplace for all employees, subcontractors, clients and visitors.

Our objective is Zero Harm. We will promote a positive safety culture and achieve excellence through:

- Consulting with clients and stakeholders to fully understand their requirements and to meet or exceed their expectations;
- Recognising that Health and Safety is fundamental in achieving excellence;
- Ensuring DIAB Engineering meets AS/NZS 4801:2001 requirements and that they are integrated into all business activities;
- Complying with all relevant legislation and other obligations;
- Using industry best practices to identify, eliminate and minimise risks so as to ensure project realisation;
- Establishing and achieving measurable Health and Safety objectives and targets;
- Investing in the most appropriate technology solutions;
- Ensuring our systems are flexible and to encourage new ideas, technologies and innovations;
- Ensuring all employees understand and take responsibility for their own work;
- Actively seeking feedback from clients and stakeholders and addressing opportunities or areas for improvement and levels of satisfaction; and
- Reviewing and revising our Health and Safety Policy periodically to maintain relevance, effectiveness and appropriateness to our business.

Each person in the workplace is responsible to:

- Conduct their work in the safest possible manner to ensure they do not harm themselves or others.
- Ensure that they identify potential sources of hazards and act to manage those hazards at all times.
- Stop, Act and Report on any hazards or unsafe behavior they see.



Glen Payne

Chief Executive Officer
DIAB Engineering Pty Ltd

ENVIRONMENTAL POLICY

DIAB Engineering recognises that it is our social responsibility to create and implement sound environmental principles throughout our business. We are committed to sustainable business success to support the health and wellbeing of our people and protect the environment in which we work.

We are committed to performing our business in an environmentally responsible manner and will pursue environmental excellence to achieve zero harm through:

- Adoption of sustainable business practices.
- Integrating environmental considerations into business planning.
- Developing and implementing effective environmental management systems.
- Planning and managing all work activities to minimise their impact on the environment through risk mitigation processes
- Identify and address any new 'environmental aspects' that result from work / operational activities.
- Observing all environment laws and complying with ISO14001:2015.
- Building a culture by providing environmental awareness, advice and training to all employees and subcontractors.
- Timely reporting and recording all environmental incidents.
- Pursuing all avenues for more efficient use of energy and materials.
- Minimise waste and actively promote recycling across the business and amongst its customers and suppliers.
- Working effectively with local communities on environmental issues.
- Monitoring and analysing our "Environmental Objectives and Targets" to measure environmental performance.
- Reviewing and revising our HSE policies periodically to maintain relevance, effectiveness and appropriateness to our business.

DIAB Engineering will ensure that employees and subcontractors meet the minimum standards required and that all employees and subcontractors fully support this policy and put it into practice.



Glen Payne

Chief Executive Officer
DIAB Engineering Pty Ltd

INJURY MANAGEMENT POLICY

DIAB Engineering is committed to creating and maintaining a safe working environment. We will provide workplace-based injury management practices to facilitate and expedite the recovery process and help employees return to work as soon as possible.

We will provide effective injury management through a timely, systematic and proactive approach combined with active participation and cooperation of the injured worker.

We will achieve this by:

- Providing a safe and healthy workplace, and in the event of an injury, follow injury management procedures accordingly.
- Ensuring the injury management process is commenced as soon as possible following an injury and in accordance with medical advice and relevant legislation.
- Complying with legislative obligations including requirements of the Workers' Compensation and Injury Management Act 1981.
- Arranging suitable duties for injured or ill employees where possible, in accordance with the worker's medical restrictions through consultation with the injured worker, treating doctor, rehabilitation provider and the relevant site supervisor/manager.
- Ensuring that employees return to work as soon as practicable.
- Formally monitoring, auditing and reviewing our injury management process and return to work programs to ensure they operate effectively and as a minimum comply with relevant legal and other requirements.

DIAB Engineering's Management will ensure that this policy is communicated throughout the business and successfully implemented by all employees.



Glen Payne

Chief Executive Officer
DIAB Engineering Pty Ltd

UNION RIGHT OF ENTRY POLICY

A Trade Union Representative may seek to access a workplace in order to represent the interests of their members or potential members. DIAB Engineering will ensure that the workplace is not unduly disrupted by the exercise of representative rights.

Reasons for union officials to enter the workplace

In line with the Fair Work Act (2009) DIAB Engineering allows a union official to enter the workplace during working hours for three specified reasons:

1. To investigate suspected breaches of industrial law and instruments.
2. For Occupational Health & Safety purposes.
3. To hold discussions with employees.

Union official requirements to enter the workplace

Before entering the workplace, a union official must:

- Hold a valid and current federal permit to enter and inspect the premises
- Provide at least 24 hours written notice of entry unless entry is under a work health and safety (WHS) law.

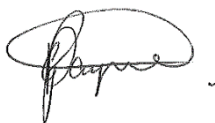
Important protocols for a union official to enter the workplace

- Employees are to inform their immediate supervisor, or senior management, immediately if a union representative requests entry.
- If DIAB Engineering is not the “occupier” of the work site, then the relevant occupier must also be informed.

The delegated DIAB Representative will ensure that:

- The purpose for which the ROE is sought is identified and confirmed.
- The entry is granted only for the day specified in the entry notice and that it is during working hours.
- The union delegate is to be escorted at all times.
- Meetings are to be held in rooms/areas designated by DIAB Engineering and no access is provided to crib rooms.

DIAB Engineering’s Senior Management and HR Department will manage compliance with Right of Entry for inspection and/or investigation of any suspected breach. DIAB Engineering will not hinder or refuse entry to a permit holder who is entitled to enter the premises under the Fair Work Act or an OHS law.



Glen Payne

Chief Executive Officer
DIAB Engineering Pty Ltd

CORPORATE SOCIAL RESPONSIBILITY POLICY

DIAB Engineering strives to operate a strong and sustainable business that contributes positively to the social, environmental and economic wellbeing of the local communities within which we operate. We are therefore committed to behaving ethically in all aspects of our business operations and operating in a socially responsible way.

Our approach to Corporate Social Responsibility is structured around four key areas:

- **People:** Our employees are instrumental to our ongoing business success, and we are committed to providing a positive and engaging workplace. In addition, we take steps to understand our impact on customers, sub-contractors, suppliers and the broader community.
- **Environment:** We value environmental sustainability, and ensure that we conduct our business operations, decisions and actions with minimal impact to the natural environment.
- **The Economy:** We will positively contribute to the local and national economy. We will proactively consider the financial and non-financial impact of our business operations, decisions and actions on the sustainability and prosperity of the local and national economy.
- **Community:** We value our communities and take steps to understand and nurture our impact on the local and wider community.

Corporate Social Responsibility will be integrated into our daily operations by:

- **Valuing Communities:** We will engage with all stakeholders, to meet or exceed ethical, legal, commercial and public expectations.
- **Client Planning:** We will undertake formal reviews with our clients to identify how we can link in with their corporate social responsibility plans, local communities and the surrounding areas, and agree a specific action plan for the life of any contract.
- **Support Programs:** We will ensure that our support programs and contributions, including financial donations and sponsorship to local sporting and community groups, are diverse and fair to all concerned.
- **Training and Development:** We will provide active training and development programs such as apprentice intakes, assistance with senior high schools and workshop training for technical schools.

We strive to be a responsible “corporate citizen” and will continually seek ways that we can positively contribute to and support the communities within which we operate in.



Glen Payne

Chief Executive Officer
DIAB Engineering Pty Ltd

ANTI-BRIBERY & CORRUPTION POLICY

1. Overview

This Policy sets out the anti-bribery and corruption rules and principles that apply to DIAB Engineering Pty Ltd (**DIAB**).

This policy:

- extends to all of DIAB's dealings and transactions, both locally and overseas, with clients, government authorities, contractors, suppliers and the community as a whole;
- applies to all DIAB directors, officers, employees, (DIAB Personnel) (and to the extent expressly specified in this Policy, to DIAB's contractors, suppliers and agents), regardless of where they are geographically located or locations in which they perform work for DIAB; and
- must be complied with even if the applicable local laws in any geographical area are not as strict as the requirements set out in this Policy. Where local laws are stricter, DIAB personnel must comply with those laws in addition to this Policy.

This Policy applies to DIAB's operations worldwide to ensure that DIAB complies with anti-bribery laws (including the Australian *Criminal Code 1995*, the UK *Bribery Act 2010* and the US *Foreign Corrupt Practices Act 1977*) that may apply beyond their national borders. The financial penalties for bribery offences can potentially be very significant and serious for individuals and DIAB, and may include fines of an unlimited amount and/or criminal sanctions.

DIAB treats any breach of this Policy by any person or entity (including DIAB's contractors and suppliers) as a serious matter, and reserves the right to take appropriate disciplinary steps against any offenders where it considers it warranted.

If you are in doubt about whether something will violate this Policy or relevant laws, please contact BGC's General Counsel (Belinda Murray, bmurray@bgc.cc, 9260 2316) before proceeding any further.

2. Bribery

DIAB *prohibits* the giving or offering of bribes to anyone, regardless of whether the recipient is a government or "Public Official" (as defined in section 3 below), or the recipient is acting for a private sector business. This prohibition applies to DIAB Personnel and DIAB's contractors, suppliers and agents.

Bribery occurs where a person either:

offers, promises or gives another person a benefit with the intention of influencing the recipient in the exercise of their duties to attract new business, keep existing business or secure a business advantage, which is not legitimately due to the person; or requests, agrees to receive or accepts such a benefit from a third party.

Any sort of benefit or advantage that is offered or provided can constitute Bribery – ie. the benefit does not have to be financial, it can be anything that the proposed recipient attaches any form of value to (such as gifts, meals, tickets to sporting or entertainment functions, travel expenses, discounts, rebates, kick-backs, donations, preferential treatment and favours).

Importantly, Bribery may occur regardless of whether:

- the benefit in question is actually provided or whether it secures the outcome intended (ie. the mere offering or requesting of a benefit will still constitute bribery); or
- the benefit in question is offered to, or accepted by, a third party (ie. someone other than the two parties involved in the transaction or business opportunity).

Facilitation Payments, and the offering, giving and/or receipt of Gifts or Hospitality, Political Donations or Sponsorships may constitute Bribery in relevant circumstances.

As a result, such benefits should only be offered, provided or received in accordance with this Policy: see section 3, section 4 and section 5 (below).

3. Facilitation Payments

DIAB *prohibits* the offering of, or making of, **Facilitation Payments** to any **Public Officials**. This prohibition applies to all DIAB Personnel and DIAB's contractors, suppliers and agents.

The only situation Facilitation Payments are permissible is where your liberty or safety (or the liberty or safety of another person) is genuinely at risk if you do not make the Facilitation Payment. Any Facilitation Payment in such circumstances must be reported to BGC's General Counsel as soon as possible after it is made and you must maintain an accurate record of the payment (as set out in section 6(b) below).

A **Facilitation Payment** is the payment of money or the provision of gifts to a public official in order to speed up or secure the performance of a routine action or process which DIAB is entitled to have performed for it, and the government official is ordinarily obliged to perform. A Facilitation Payment is a common example of Bribery.

Examples of Facilitation Payments include:

- a payment to a customs official to speed up the release of goods from a customs warehouse, where the payer is entitled to the release of the goods and where the payment is outside of the official process; and
- a payment outside of the official process to facilitate the installation of a telephone line where the payer is entitled to the line by law or contract.

Public Officials are people who perform a public function in a country or location, and include but are not limited to:

- any government officer, employee or other representative (local or national, foreign or domestic);
- any person with a legislative, administrative or judicial function (whether appointed or elected). For example: judges, tax officials, customs officials, regulators, government personnel who issue licences or permits, planning officials and immigration officials;
- all politicians and political candidates (local or national, foreign or domestic);
- any political party official;
- any member of a royal or governing family, including any person who holds or performs the duties of any appointment created by custom or convention or who otherwise acts in an official capacity (including some indigenous or tribal leaders who are authorised to act on behalf of the relevant group);
- the officers, employees and representatives of government-owned or controlled organisations and publicly-funded organisations. For example: employees of state-run hospitals and employees of central banks. In numerous countries many businesses and organisations are State-owned enterprises so their employees would also be public officials;
 - any international public organisation's employee, officer or representative, such as the United Nations or the World Health Organisation; and
 - any person who holds themselves out to be an authorised intermediary of a government official.

4. Offering or Accepting Gifts or Hospitality

Gifts or Hospitality means anything of value, and may take the form of money, meals, tickets to any functions (ie. business, entertainment or sporting functions, including functions hosted by DIAB or BGC Contracting), services, coupons or discounts, or a promise to provide any such benefits in the future.

DIAB personnel offering or providing Gifts or Hospitality to others (e.g. clients or prospective clients) or accepting Gifts or Hospitality from others (e.g. suppliers and subcontractors) can sometimes constitute Bribery.

In deciding whether to offer any Gifts or Hospitality to anyone, or accept Gifts or Hospitality from anyone, the following guidelines must be followed:

- (a) Gifts or Hospitality offered must not affect the independence or objectivity of the recipient.

Professional judgement and utmost care must be exercised at all times to ensure that the offering, giving or receiving of the Gifts or Hospitality does not create a reasonable perception that it is intended to influence the business relationship between the company and the recipient of the gift (or vice versa) in an improper or unprofessional way.

As a general rule, this means that Gifts or Hospitality should only be offered, or accepted, if they are occasional and of modest value.

- (b) Gifts of money must not be made or accepted unless prior approval is obtained from BGC's General Counsel or BGC's Chief Executive Officer.
- (c) Gifts or Hospitality must not be solicited or requested.
- (d) You must obtain *prior* written approval before offering, or accepting, any Gifts or Hospitality where:
 - (i) the Gifts or Hospitality exceeds a value of AUD\$300 per person regardless of who it is offered to or received from; or
 - (ii) the Gifts or Hospitality (regardless of value) is to be provided to, or accepted from, a Public Official.

Prior approval must be obtained from the following individuals:

- where the Gift takes the form of money – BGC's Chief Executive Officer or General Counsel; and
- where the Gift or Hospitality takes any other form – from a line-manager (who must be at least at General Manager-level).

Once you have obtained approval to offer to any person (or receive from any person) a Gift of Hospitality exceeding \$300 in value, you must *immediately* complete a "Gift Register Declaration" form and send it to the BGC's General Counsel.

- (e) Keep a record of the Gift or Hospitality offered or accepted as set out in section 6(a) below.

Note: Gifts or Hospitality offered to (or for the benefit of) a politician, political candidate, political party representative, employee or intermediary, are likely to constitute a "political donation", so please refer to section 5 below for additional guidelines that apply.

DIAB's suppliers, agents and contractors must ensure that to the extent they offer any Gift or Hospitality to any DIAB client or perspective client, it is made clear to the recipient that the Gifts or Hospitality are not made for (or on behalf of) DIAB, and/or on account of DIAB's business relationship with the recipient.

5. Political Donations and Sponsorships

DIAB may only offer donations or sponsorship (including Political Donations) in accordance with BGC's Donations & Sponsorships Policy.

DIAB suppliers, agents and contractors are strictly prohibited from offering or making any donations or sponsorships of any kind, unless the recipient understands that the contribution has not been made for (or on behalf of) DIAB, and it is not associated with DIAB's business with the recipient.

6. The do's and don'ts

(a) Things you **should** do to help ensure compliance with DIAB's legal obligations

- (i) Create a culture that aligns with our values by:
 - acting honestly and ethically in all your business dealings;
 - complying with, and being accountable for adherence with, the law, as well as DIAB's policies and business procedures;
 - promptly reporting any suspected or actual violations of this Policy to BGC's General Counsel;
 - seeking guidance from BGC's General Counsel when faced with any ethical or legal challenge; and
 - if you operate in a supervisory role – always:
 - engage in model ethical behaviour;
 - encourage open communication with employees and provide guidance and feedback in response to their questions or concerns;
 - report violations, escalating issues or seek help from BGC's General Counsel; and
 - ensure that no employee is retaliated against for reporting suspected or potential violations of this Policy or applicable laws.
 - Where you have received prior approval to offer or receive a gift valued at \$300 or more per person to or from anyone, immediately complete the "Gift Register Declaration" form and send it to the General Counsel.
- (ii) Record-keeping – keep accurate financial and business records that fairly reflect any business dealings you conduct on behalf of DIAB, especially in relation to Gifts or Hospitality you offer to third parties. DIAB prohibits any accounts being kept "off-book" to facilitate or conceal improper payments.

For any Gifts or Hospitality you offer or receive from anyone, you must keep the following records, which can be produced to DIAB upon request:

- the date the offer was originally made, and the date it was accepted;
- the description of the Gift or Hospitality (e.g. location of the function, the item given);
- the name and title of the individuals to whom the gift was offered, and those who accepted it;
- the business purpose/reason for the expense or gift; and
- the total value of the Gift or Hospitality offered to the client, and the total value of the accepted Gift or Hospitality.

Note: The obligation to maintain your own records of any Gift or Hospitality you offer or receive, is separate from (and in addition to) your obligation to complete a "Gift Register Declaration" where required by this policy.

- (iii) Attend and complete all training sessions or e-modules that DIAB offers regarding the application of this Policy.

It is the responsibility of each executive, officer, employee, contractor and agent to attend training that provides you with more information on this Policy and the laws that may apply in the jurisdictions in which you work. If you are ever in doubt, please contact BGC's General Counsel.

(b) **Things you must not do**

It is important that you do not do any of the following which may constitute a breach of our obligations:

- offer, promise or give Gifts or Hospitality to a person if that is intended to convince the person (or could be reasonably perceived as trying to influence the person) to perform their job improperly or to reward such improper performance;
- offer, give or receive Gifts or Hospitality that create (or could reasonably be perceived as trying to create) a business obligation between DIAB and another party;
- offer, promise or give Gifts or Hospitality to a person where you know their governing statute or internal policy prohibits the giving or receiving of gifts or attendance at corporate hospitality;
- offer, promise, give or receive Gifts or Hospitality to a Public Official without the prior approval of BGC's General Counsel or BGC's Chief Executive Officer – and do not request approval for such Gifts or Hospitality where you consider it is inconsistent with the spirit of this Policy;
- offer, promise, give or receive Gifts or Hospitality to, or from, a particular person so regularly or frequently as to create an impression of impropriety;
- offer, promise, give or receive Gifts or Hospitality valued at more than AUD\$300 (per person) *without* the prior written approval described in Section 4(d) of this policy;
- offer, promise, give or receive Gifts or Hospitality of a nature that are illegal or inconsistent with the company's image as a leading construction, contracting and mining services business;
- offer, promise, give or receive Gifts or Hospitality that could be considered disproportionate;
- offer, promise, give or receive money;
- solicit or request Gifts or Hospitality to be provided;
- accept an offer of free travel or accommodation unless:
 - (i) it is for business-related purposes; and
 - (ii) prior written approval has been obtained in accordance with Section 4(d) of this policy.

These rules are strict – and DIAB personnel must ensure they do not engage in prohibited conduct regardless of:

- the country in which you or the recipient of the benefit is located;
- whether the benefit is promised or given to the person concerned or to a third party (e.g. a family member);
- whether the benefit is promised or given by you personally or by a third person (e.g. an agent or intermediary);

- local custom/locally acceptable practice;
- the value of the benefit; or
- whether the benefit to the business of DIAB has already occurred (e.g. a gift given after a decision is made by a Public Official).

7. Business Associates

DIAB may be held liable for any Bribes offered or paid by its Business Associates (or received by its Business Associates) which are considered to confer a direct or indirect benefit on DIAB.

Business Associates are people or corporate entities that interact with others for, or on behalf of DIAB. A party may be a Business Associate of DIAB because either:

- DIAB has formally requested or authorised it to act on DIAB's behalf (either orally or in writing); or
- based on its past dealings with DIAB, a reasonable person would assume that the party is acting for or on behalf of DIAB (regardless of whether DIAB has authorised it to act for or on behalf of DIAB in this instance).

Business Associates may include:

- agents, consultants, intermediaries and other representatives (including import and customer agents);
- finders and introducers;
- brokers;
- vendors and outsourcers;
- tax advisors, lawyers and sales and marketing firms;
- lobbyists (of any kind);
- joint venture partners; and
- subsidiaries and affiliates.

Please also consult the BGC Process Document titled "Business Associates – Red Flags" for examples of some factors or circumstances that suggest a potential Business Associate may pose a *heightened* Anti-bribery & Corruption risk

Prior to engaging any Business Associate for DIAB:

- (a) ensure you conduct any tender or expression of interest to identify a suitable Business Associate in a manner that is consistent with the spirit of BGC's Tendering & Procurement Policy;

- (b) if the Business Associate *may* operate for, or on behalf of, DIAB in a country outside Australia – if the country in question scores below 40 on Transparency International's most recent Corruption Perceptions Index (see <https://www.transparency.org/country/>), do **not** authorise the Business Associate to provide services to DIAB in that country until you receive written approval from BGC's General Counsel; and
- (c) seek written approval from BGC's General Counsel to continue using the Business Associate where:
 - (i) the Business Associate has undergone a change in senior management since DIAB engaged it; or
 - (ii) DIAB's contract with the Business Associate has been in place for more than 36 months.

8. Reporting & Whistleblowing

If you identify, or have any reasons to suspect that DIAB personnel or DIAB's suppliers, agents or contractors have acted in manner that is inconsistent with this Policy, please report this matter to DIAB in accordance with BGC's Whistleblower Reporting policy.

DIAB does not tolerate retaliation of any kind against personnel who raise genuine concerns or who participate in the investigation of a report of suspected misconduct. If you engage in retaliation you will be subject to disciplinary action, which may include termination of your employment.

DIAB takes all reported concerns seriously. Where appropriate, DIAB will investigate reports of bribery in any way connected to DIAB, and consider what action to take as a result of such investigations (including, where applicable, disciplinary action against personnel (which may include dismissal), termination of business relationships and reports to relevant governmental authorities or regulators).

9. Queries

Please contact BGC's General Counsel immediately if:

- you have any query about the application of this Policy; or
- you are unsure how this Policy operates in conjunction with other BGC policies.