

SBG O&M COMMUNICATION PARTICIPATION AND CONSULTATION





SCOPE

The SBG O&M encourages the two-way flow of information between the workforce and management. Employees input are considered vital in the development of health, safety and environment policies and procedures. Employee's input on concerns relating to HS&E and any feedback on how the health and safety management system can be improved are equally as important.

PROCESS

Employees will be kept informed of matters relating to their health, safety and welfare by Health and Safety Representatives, Supervisors and Managers.

Communication and consultation will take place both formally and informally. Health and safety representatives are appointed to assist the SBG O&M with the process. Health and safety representatives will attend health and safety committee meetings where as part of their duties they will be encouraged to raise HS&E matters on behalf of employees they represent and also feedback to their respective areas any HS&E information relating to health and safety of employees.

The health and safety committee's will consist of the following: -

- · Health and Safety Co-ordinator
- Managers
- $\cdot \ Supervisors$
- · Employee Representatives
- · Specialists; Health and Safety Consultants (as and when required)

The health and safety committee will assist in the development of policies, procedures, safety objectives and targets.



The inputs to health, safety and environment consultation will include the following:

- · Identification of hazard and risks
- · HS&E Objectives and targets
- · Incident investigations
- · Health and safety action plans
- · Operational changes affecting HS&E
- · Introduction of new plant and equipment
- · Contractors and visitors to site
- · HS&E information request from interested parties

The outputs form communication, consultation and participation will allow the SBG O&M to: -

· Consultation with employees over the development of the site HS&E policies, risk assessment and controls.

Communication of the site HS&E policies, risk assessment and controls to employees, contractors and visitors.

Consultation with employees on the processes and procedures to manage risk.

Consultation with employees on the introduction of, or change to, anything that may affect HS&E in the workplace.

Communication of HS&E performance to employees.

Communicate effectively with interested parties

Health safety and environmental information will be communicated around the site through the following:

- · Health and safety communication boards
- · Health and safety signs and notices, memo's, letters
- · Team talks
- · Toolbox talks

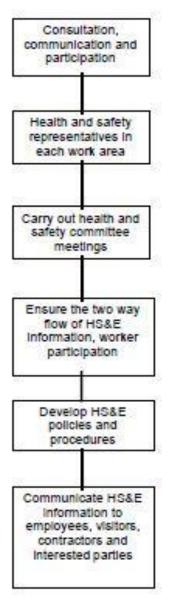


· Minutes of committee meetings

The SBG O&M will communicate health and safety requirements with visitors and contractors attending our sites. Visitors to the site will receive health and safety information relating to the site rules and procedures during signing in procedures. In addition contractors will be required to go through a contractor's induction.

The SBG O&M will communicate with our interested parties through the supply of HS&E information upon request, e.g.

- · Request from our insurers for health, safety and environmental management systems
- · Request from Enforcing Authorities for information on health, safety and environment management systems





Engagement with Personnel

All SBG O&M facilities shall have processes in place that provide personnel the opportunity for participation and feedback. This shall include:

- · Leadership and departmental meetings
- · Working groups and routine safety meetings with personnel to address HSLP matters
- · Health & Safety Committees (structure shall meet regulatory requirements)
- · Workplace inspections, hazard reporting, and behavior observations
- \cdot Risk assessments for work areas and the development and implementation of controls
- · Accident/incident investigations
- · Consultative processes where there are changes that could affect workplace HSLP
- · Education, training and review of standards, procedures, equipment selection and use

Planning for Internal Communication of Significant

Changes or Impacts

For significant changes or impacts to the SBG O&M facilities identified through risk assessments, or modifications to roles, responsibilities, authorities, procedures or behavioral expectations, the operation or facility shall develop and implement a process to:

- · Identify and then engage with personnel that may be directly impacted by the change or activity before the activity is undertaken
- · Identify relevant personnel who need to be involved in the pre-planning or implementation process

Internal Communication

Processes for communicating information between levels within the organization shall be consistent with the organizations management operating systems.

All SBG O&M facilities shall communicate with relevant personnel to ensure awareness of the following information:

· Values and Policies



- · HSLP roles and responsibilities
- · HSLP legal requirements and other commitments
- · Statistical data and trends for accident/incident occurrences and corrective actions
- · Emergency preparedness
- · Significant risks
- · Objectives and targets
- · Relevant Standard Operating Procedures

External Stakeholder Identification and Pro-active Engagement

All SBG O&M facilities shall have systems in place to identify external stakeholders and adopt proactive engagement strategies. This shall include:

- · Emergency services
- · Healthcare providers
- · Legal counsel
- · Federal, state and local governing bodies
- · Industry trade groups, chambers and committees

Records of Documentation Relating to External Stakeholder

Engagement

All SBG O&M facilities shall document their stakeholder engagement processes incorporating the following:

- · Stakeholder mapping and engagement plans approved by the Leadership Team(s)
- · Risk assessment outcomes and controls
- · Records of stakeholder engagements maintained and available

Internal and External Reporting

All SBG O&M facilities shall have a formal process for internal reporting of performance against the following:

· Objectives, targets, and Continuous Improvement Plans



- · Significant risks and opportunities
- · Accident/incident investigation findings and lessons learned

All SBG O&M facilities shall have a formal process for external reporting against the following:

- · Corporate reports and brochures
- · Statutory reports
- · Industry trade groups, chambers and committees.

Documentation

Records of internal/external stakeholder engagement shall be maintained as per approved Record Documentation and Management protocols.

Monitoring and Review

All SBG O&M facilities shall establish a process to ensure that communications and consultation activities are monitored and reviewed at least annually to ensure their effectiveness and to provide the opportunity for feedback.