HEALTH, SAFETY & ENVIRONMENTAL MANAGEMENT PLAN

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1.0 OVERVIEW

This Management Plan defines how potential risks associated with health, safety and environmental activities carried out by Daly Concrete will be managed.

All Daly Concrete personnel will be given a presentation of this Plan by the delegated Company Management representative, and informed of their individual responsibilities and accountabilities to manage HSE issues and reduce the potential for hazards or incidents.

This Plan is supported by requirements, regulations, procedures and safe work practices designed to minimise hazards or environmental incidents, and ensure the health and safety of all personnel involved.

Where the term 'Company' is used, this shall be taken to mean Daly Concrete.

Where the terms “workers” or “employees” are used, these may be taken to also include subcontractors without specific mention.

2.0 OBJECTIVES

- To achieve effective HSE management requires the commitment of all Company workers through the application of:
  - detailed planning
  - structured application of Codes, Standards and Procedures
  - risk assessment and job hazard analysis to reduce and control, effectively, any assessed risks or hazards.
  - effective communication and consultation, both internal and external to Daly Concrete.
  - promotion and assistance to workers and subcontractors, to embrace and support HSE initiatives.

- All Company workers are committed to providing the best cost-effective services with safe systems of work that will attain our ZERO injuries. Meeting and exceeding this target is our goal. This Plan provides the pathway to ensure that performance goals are aligned and integrated with HSE management systems of the Client.

3.0 COMMITMENT

- Daly Concrete's Management Team will continually demonstrate consistent, disciplined and visible leadership to ensure high standards of work practices, behaviour, attitudes and actions towards health, safety and the environment.

- The Company believes that Safety is a core value, and that:
  - all incidents are preventable.
  - all individuals are accountable for the health and safety of themselves and others, and care of the environment.
  - every individual must identify hazards, and assess and manage associated risks.
  - every individual must have the skills and be equipped to work safely. Any task that cannot be done safely will not be done.

- To meet this commitment Daly Concrete will review this Plan on an annual basis in consultation with our workers to ensure ongoing improvements.

4.0 STATUTORY ACTS, REGULATIONS AND STANDARDS

- This Plan encompasses compliance to relevant Legislation, Codes of Practice and Standards for both the Company and Client, including but not limited to:
  - Alcohol and Drug Authority Act 1974
5.0 COMPANY POLICIES

- Company workers will comply with the following:
  - Health & Safety Policy
  - Environmental Policy
  - Rehabilitation Policy
  - Fitness for Work Policy - Alcohol & Drug Policy

6.0 INSURANCES

- Daly Concrete will, at all times, have the appropriate insurances for Public Liability, Workers Compensation, etc. as required by Law.

7.0 EMPLOYEES

7.1 Employee Selection

- All Daly Concrete workers will be trained, competent persons with proven experience in the concreting industry.
- If required, a pre-employment medical examination will be undertaken by the potential worker.
- Employment will include review of all trade papers, licenses, tickets, etc. presented at the preemployment stage. These items will be confirmed as valid for the date period and a copy retained by Daly Concrete for Company records. Verification of information will be required if deemed necessary.
- Daly Concrete will make a copy of any paperwork available to the Client - with the exception of sensitive information - as required.

7.2 Employee Induction (Daly Concrete)

- All Daly Concrete workers will be given an introduction to the Company, its rules, regulations and Policies in effect at the time of employment.

7.3 Employee Induction (Client site)

- It is generally assumed that a condition of entry to work on the Client’s site is attendance at a mandatory induction course.
- All Daly Concrete workers will attend a Client induction prior to commencing working on site, with a follow-up session at prescribed intervals.
- Daly Concrete’s Site Management is responsible for ensure all Company workers, regardless of previous experience, attend and participate in an induction; including existing, new and subcontract workers.

7.4 Buddy/Mentoring Period
• To assist in reducing exposure to unfamiliar hazards in specific Client site areas, new Daly Concrete workers will “buddy up” with a core crew member until sufficient familiarisation has developed.

8.0 SUBCONTRACTORS

• Subcontractors who perform work for Daly Concrete are required to provide their Health, Safety and Environmental Policies.

• If required, subcontractors will provide a Health, Safety & Environmental Management Plan. This may be made available to the Client if requested.

• Contractors will be assessed for compliance against their HSE Management Plan relevant to their scope of work.

8.1 Safety Responsibilities

• Individual subcontractors will be held responsible for their own safety and environmental work practices on the Client’s site.

• Daly Concrete will be deemed responsible for its subcontractors to the extent that the Company can control them, insofar as ensuring all subcontract personnel associated with the contract comply with the Client’s HSE requirements/Management Systems.

9.0 DUTY OF CARE

• Every person working for Daly Concrete has a role to fulfil, and will be made aware of individual accountabilities and responsibilities attached to the role at pre-employment, on-boarding, inductions, performance appraisal, and other appropriate communication forums.

• Legislation in force at the time places a responsibility (duty of care) on employers and workers. All Daly Concrete workers will understand that accountability set down by the relevant Regulations are clearly recognised and the minimum requirement to be met by the following:

9.1 Employer

• Provide a safe workplace, safe plant/equipment and safe systems of work.
• Provide information, instruction and training.
• Consult and cooperate with workers.
• Provide Personal Protective Equipment.
• Provide safe plant and materials.
• Ensure subcontractors are capable of guaranteeing the health and safety of their workers as well as environmental compliance of their operations in compliance with Client requirements.

9.2 Employee

• Ensure own health and safety at work.
• Avoid adversely affecting the health or safety of any other person through any act or omissions at work.
• Reasonably comply with instructions given by the employer for his own safety or health and that of other workers.
• Use all protective equipment and clothing provided by the employer.
• Report any situation which has the potential to cause a hazard to any person or affect the environment.
• Daly Concrete will appoint an elected Health & Safety representative on site, who will consult and cooperate with the Client in respect of all HSE matters. This position will provide leadership for other workers and ensure effective consultation, involvement and communication.
9.3 Subcontractor

- Take reasonable care to ensure his or her own safety and health at work.
- Avoid adversely affecting the safety or health of any other person through any act or omissions at work.

9.4 Client / Principal

- Duties under Regulations and Acts require people who have control of a workplace (in this instance deemed to be the Client) to ensure, so far as is practicable, that the workplace and all accessways are kept clear and in good condition so that people who use the workplace are not exposed to hazards.
- Client will advise the Company at all times, of any specific health, safety and/or environmental requirements and regulations to be observed on site.

10.0 HAZARD IDENTIFICATION, RISK ASSESSMENT and RISK CONTROL

10.1 Identification, Assessment and Control of Hazards and Risks

- Hazard and environmental aspect identification and risk management is developed through an integrated process, based on the principles of AS/NZS 4360-1995 “Risk Management”.
- This tool will be used in planning a contract to quantify critical risks and ascertain the probability of occurrence, and the expected or potential consequences that may result from an event occurring.
- Such assessment will cover the total scope of work for the contract - health, safety and environmental - including activities of subcontractors.

10.2 Job Safety / Environmental Analysis (JSEA) - Appendix F

- Daly Concrete will ensure that a JSEA is completed for all work tasks. JSEAs are viewed by the Company as an invaluable tool for the identification, assessment, control and communication of workplace and activity hazards.
- JHEAs will be conducted in a team-based environment. Training is provided for key people within the operation to assist and facilitate hazard identification and risk management.
- No work will commence until the JSEA has been signed off by the Company Management representative.

10.3 Risk Management Process

- Daly Concrete will observe the following steps regarding risk management:
  1. Establish scope/context
  2. Identify risk
  3. Analyse risk
  4. Evaluate risk
  5. Treat risk
- As an adjunct to the above, all risks will be appropriately addressed in a timely manner, with communication and consultation between all involved parties, with monitoring and review.

10.4 Measurement and Evaluation

- Work area inspections will be conducted on a continuous basis to verify that:
  - Risk controls are in place and being followed.
- Hierarchy of control is being adhered to.
- Safe working practices are being applied.
- Safe work conditions prevail.
- Environmental requirements are being met.

Any breach of any of the above will be immediately addressed, reported and recorded.

11.0 INJURY MANAGEMENT and REHABILITATION

11.1 Injury Management

- Daly Concrete will ensure the appropriate, effective and timely manage of all injuries (whether workrelated or non-work related).
- In the event of an injury on a Client site, the person will attend or be delivered to the Client’s designated treatment area. For all other locations, the nearest medical facility will be sourced.
- Full details of the event will be provided to the Company (and the Client if on site) are to be reported to the Company, with the appropriate key personnel notified of the injury and status of treatment.
- The reporting function for injuries is as follows:
  - Initial response/treatment to an injury
  - Minimise further injury impact
  - Coordination of ongoing treatment/follow-up
  - Workers Compensation processing

11.2 Rehabilitation

- Daly Concrete recognises the importance of minimising the personal impact of injury to its workers, and has a responsibility to provide workplace rehabilitation for work-related injuries.
- Employees have a reciprocal obligation to cooperate and actively participate in rehabilitation.
- The rehabilitation process provided by Daly Concrete will ensure a speedy return to work:
  - Appropriate and timely service, based on assessed needs
  - Early intervention
  - Provide meaningful alternative duties as determined
  - Maintaining injured or ill workers in a previous position or returning them to other suitable employment
  - Compliance with Workers Compensation legislation

12.0 SAFETY ISSUE RESOLUTION

- Where a Company worker encounters what s/he believes to be a health, safety or environmental hazard, or is allocated work to perform what s/he considers constitutes an unfair situation, the worker will discuss the situation immediately with Daly Concrete Site Management.

- The following process will be followed:
  1. Worker and Company Site Management discuss and agree on resolution to situation in appropriate time frame. Rectified and return to work.
  2. If not resolved immediately, employee will be provided with alternative work while awaiting resolution of issue.
  3. If issue remains unresolved, Daly Concrete Directorship will be contacted for decision.
  4. If no appropriate, agreeable resolution can be reached, the relevant governing body (Federal or State) will be contacted. This body’s decision will be binding on all parties.
13.0 INCIDENT IDENTIFICATION

- All serious incidents involving Company workers on site will be reported immediately to the nominated Client representative. Serious incident types are:
  - fire or explosion
  - exposure to harmful substances
  - electric shock
  - exposure to radiation
  - personnel falling
  - stress or strain injury
  - objects falling
  - loss of consciousness - environmental spillage
- All incidents will be recorded and documentation retained as required.

14.0 INCIDENT REPORTING and INVESTIGATION

- All Company workers and subcontractors are required to report at the time, all incidents, near misses and hazards with the potential to cause injury, damage or harm to personnel, equipment or the environment.
- Company Management and the Client will be notified as required. Primary reporting will be verbal communication, followed by submission of documentation.
- Daly Concrete and its workers will participate fully in any investigation.
- Incidents will be classified according to the Company’s “Consequence” rating table (Appendix F).

15.0 PRE-START INSPECTIONS

- Company workers will be informed about hazards in their work area prior to the start of each task.
- Workers will review direct and surrounding work areas, and where appropriate develop an agreed work method (JH/SA) to identify and resolve hazards in the workplace prior to starting the task.
- Upon completion of inspection, Company Management will review requirements noted on the JH/SA with workers. All will sign the form which will remain with the crew or Management while the work occurs.

16.0 PRE-START (TOOLBOX) / DEBRIEF MEETINGS

- Daily start and end-of-Shift communication meetings will be held with workers. These meetings will provide up-to-date information to all Company workers together with a regular forum for feedback on safety-related issues raised during the interim period.

16.1 Pre-Start

- Topics discussed may include:
  - day’s activities - task, hazard, control
  - training/instructional session on Company and Client standards and safety awareness packages
  - review of injuries and near misses/hazards
  - permits / JHSE’s - issues and concerns

16.2 De-Brief

- Topics discussed may include:
  - injuries/incidents from Shift completed
- final check of permits
- any hazards requiring attention - improvement suggestions

17.0 DISTRIBUTION OF HEALTH, SAFETY & ENVIRONMENTAL INFORMATION

- Toolbox and pre-start meetings are regarded as the appropriate venue for distributing HSE information, alerts, reports, health and hygiene promotion, etc.
- The Company’s nominated HSE representative is responsible for cascading all information to the workforce.
- Safety noticeboards will be made available in all crib huts for the distribution of relevant safety, health and environmental information.

18.0 EMERGENCY PREPAREDNESS, RESPONSE AND CRISIS MANAGEMENT

18.1 Emergency Situation

- An emergency can be described as an abnormal or dangerous situation requiring prompt action to control, correct and return to a safe condition. An emergency on a Client site can include:
  - fire or explosion
  - accident involving serious injury to an individual
  - cyclone
  - bomb threat
  - gas release (toxic and flammable)

or any circumstance that is clearly an emergency situation requiring an emergency response.

18.2 Evacuation

- Upon notification of evacuation (verbal, siren, etc.) all Daly Concrete workers will immediately proceed to the nearest Muster Point where the Company's Site Manager will direct workers as required. A roll-call will be conducted to ensure all workers are accounted for, and safe.

- Daly Concrete workers will participate in mock emergency drills as required by the Client, including allocating time for training and emergency response exercises.

- An Emergency Contact List will be maintained by Daly Concrete for its workers.

- Daly Concrete workers will follow directions and instruction from the Client during emergency situations.

18.3 Injured Personnel

If for any reason a Daly Concrete worker is injured in the emergency event, ALL notification to next-of-kin will be made through the Company Director.

19.0 FIRST AID

- Daly Concrete will maintain a basic First Aid kit on site. Injuries requiring additional attention will be referred to the Client's nominated First Aid Post/Medical Centre.

20.0 VEHICLES, PLANT & EQUIPMENT ON SITE
• Daly Concrete will ensure that any plant and equipment categorised as “classified plant” under the appropriate Legislation, is registered and operated in accordance with said Regulations.

• Company workers will observe all regulations relating to site access, speed limits, and the use of vehicles for carrying personnel.

• Only competent workers with the appropriate skills, licenses and authorisation will operate such plant, equipment and vehicles.

21.0 ROAD SAFETY and TRAFFIC MANAGEMENT

Daly Concrete workers will take all necessary action to minimise the risk of injury and incident from the use of and/or interface of heavy and light vehicles.

• All transportation (both on and off site) will be conducted in accordance with the relevant Road Traffic Regulations and applicable site road safety requirements.

• All Daly Concrete drivers will hold a valid license appropriate to the vehicle classification being driven.

• All Daly Concrete drivers will be in a condition fit to drive.

• Client speed limits, traffic density, road conditions, vehicle escorts, oversize loads, vehicle & pedestrian interaction, fatigue management and loading/unloading activities will be observed; and a risk assessment will be developed if required by the Client.

• All light and heavy vehicles belonging to Daly Concrete will be fitted with all required safety devices.

22.0 CLEANLINESS and HOUSEKEEPING

• Daly Concrete recognises the importance of housekeeping and cleanliness at all work areas. Company and Client standards will be met at all times as a minimum.

• Monitoring will be carried out continuously via such means as visual inspection, walk-around, prestart meetings, etc.

• Non-compliance will be actioned appropriately to ensure housekeeping standards are brought into compliance.

23.0 PERSONAL PROTECTIVE EQUIPMENT

• PPE is the final level of controlling hazards.

• Daly Concrete Site Management will ensure that PPE is identified prior to commencement of work, and that all workers wear the appropriate clothing and equipment mandated by the Company and the Client.

• Jewellery will only be permitted to be worn on site at the Client’s direction. Exception to bracelets and necklaces are those of the med alert type.

• PPE will not be tampered or altered in any way.

• Compliance to the correct application of PPE is required by all Daly Concrete workers involved in a project.
24.0 FLAMMABLE LIQUIDS, FUEL and OIL MANAGEMENT

- Daly Concrete Site Management is responsible for ensuring all reasonable precautions are taken by Company workers to prevent spillage of fuel, oil or lubricants.
- Permission for use of petrol and associated equipment will be requested of the Client prior to proceeding, and all Client requirements will be strictly adhered to.
- All flammable liquids will be stored in a bunded area.

25.0 HAZARDOUS MATERIALS

- Daly Concrete Site Management will maintain a full inventory of all hazardous materials used/produced in the course of work, and the systems for the safe transport, storage and use of said materials.
- All containers used for storage or handling of hazardous materials will be appropriately labelled to allow the substance to be clearly identified by product and/or chemical name.
- Material Safety Data Sheets will be held by Daly Concrete’s Site Manager, who will ensure the Client’s nominated person/Department is kept informed of any hazardous materials that may form part of the work process.
- Provision, through signage, will also be made to alert persons entering the area that there are hazardous materials in the location.

26.0 DRUGS and ALCOHOL

- All Daly Concrete workers and subcontractors will participate in any monitoring/testing programs as required by the Company and Client during working hours, including pre-start should there be cause for concern.
- Further alcohol and drug testing can be conducted following any accident or incident if it is believed an employee may be under the effects of said substances.
- Workers are required to declare medications (prescription or over-the-counter) prior to commencing daily work. If it is deemed the person cannot continue work, site access will be withdrawn until the situation has been resolved.
- Any worker found guilty of breaching the Company’s Alcohol & Drug Policy will be subject to immediate dismissal.

27.0 FATIGUE MANAGEMENT

- Daly Concrete will ensure that processes are implemented to mitigate the risk of fatigue within the Company’s control.
- Working hours, including on Client site, will be determined by Company Management and actioned accordingly. Transport to and from site may be arranged if required, to prevent potential additional fatigue.
- Company Management will monitor and discuss workers’ fitness for work during pre-start meetings, daily observation and debrief.

28.0 NON-SMOKING

- Daly Concrete recognises the individual’s right to smoke legal tobacco products, while supporting the individual rights of non-smokers to ensure that they are not exposed to passive smoke in the workplace, vehicles or office areas.
• Smoking is only to occur in designated smoking areas, and is prohibited in the following areas:
  - All Company or Client vehicles
  - All closed spaces (including offices, workshops, toilets, confined work spaces)
  - Any area determined and signposted as “No Naked Flames” or “No Smoking”

Failure to comply will be deemed a breach and a counselling and discipline procedure will be applied as appropriate.

29.0 FIRE CONTROL

• Daly Concrete Management and workers will eliminate and/or mitigate the risk of fire to plant, equipment and the environment.

• Permits may be required on a Client site as follows:
  - No Flame Permit: any work that has the potential to create an ignition source without actual flame or spark - eg, cameras, electronic devices, vehicles, etc.
  - Flame Permit: any work that will provide an ignition source - eg, cutting, grinding

30.0 VISITOR ACCESS TO SITE

• Any visitor on site to Daly Concrete, for any reason, will lodge the appropriate access request form with the Client. Access to site will be at the discretion of the Client.

• Visitors will wear the appropriate high-visibility clothing, dress to the required standard (clothing, footwear, PPE), and be escorted at all times by an authorised Company worker.

31.0 USE OF PORTABLE POWER TOOLS AND CABLES (ELECTRICAL SAFETY)

• All Daly Concrete workers and subcontractors undertaking work involving exposure to electricity - either by supply or by powered hand tools - will work safely and in accordance with Legislative guidelines and directives.

• All electrical equipment used within operational areas (excluding office) will be tested and tagged on a quarterly basis in accordance with AS 3760.

• Regardless of the existence or not of hard-wired earth leakage protection, portable Residual Current Devices (RCDs) are to be used to provide this protection whilst working in the plant.

• All Daly Concrete workers will use a portable RCD whenever using power operated tools. RCDs will be tested to ensure they are in working order before use.

• Instruction will be provided during induction and at other appropriate periods.

• Only heavy duty extension cords are to be used on site.

• All workers will physically check leads on a regular basis and not leave it up to the quarterly tagging programme to identify faults with a lead.

• All temporary power distribution systems will incorporate RCD protection, and extension cords will not be greater than 32 m in length.
32.0 NOISE CONTROL

- Noise emissions produced by Daly Concrete will not have an impact on the local community or cause harm to personnel within the project.

- Where applicable, compliance with permissible noise limits as indicated within the Client’s Environmental License is mandatory. This will be achieved by managing noise producing activities so as best to reduce the effects of noise.

- No modifications shall occur to noise dampening systems that increase the overall noise emitted from equipment being operated.

33.0 FLORA and FAUNA PROTECTION

- Daly Concrete workers will take all appropriate steps to protect declared rare and priority flora and fauna, minimise disturbance, and conserve and if applicable re-use vegetation and topsoil.

- Company workers and subcontractors will not bring any plant material and/or seed to the Client’s site.

- All vehicles required to be used off-site will only use designated roadways.

- During mobilisation of equipment, if any workers are exposed to foreign species of flora and fauna they will stop work immediately and report the find to the Client’s Environmental representative.

- Of specific note is the existence of fauna and the frequency of animals being present on the Client’s site. All sightings will be reported to the Client’s Environmental representative.

- No animals or reptiles will be exposed to physical harm or danger by any Daly Concrete worker.

34.0 PERMITS and PERMISSIONS

- Daly Concrete will obtain all relevant permits/permissions from the Client before undertaking any of the following works as required, including but not limited to:
  - Over-width approval to move large vehicles on roads outside immediate work area
  - Excavation approval to excavate
  - Hot Work approval to weld, flame cut, etc. in a hazardous area
  - High Voltage approval to work near any high voltage Plant equipment or facility
  - Confined Space Entry approval to work in confined areas
  - Radiation approval to work in vicinity of radiation gauges
  - Surface Disturbance

35.0 BARRICADING and SIGNAGE

- Barricading will be employed as the control measure to minimise risk of injury and/or incident if uncontrolled access to an area occurs.

- Barricades will be either hard or soft (danger tape) depending on risk of uncontrolled entry. Signage colour will follow Industry standards:
  - Blue/White: Mandatory
  - Yellow/Black: Caution
  - Red/White: Danger
  and be used in conjunction with barricading.
36.0 WASTE DISPOSAL MANAGEMENT

- Daly Concrete will ensure that waste management focusses on reducing the amount of waste generated and correct disposal, so as to not adversely impact upon the environment.

- All waste will be appropriately disposed of. Recyclable wastes will be clearly identified and disposed of within correct waste recycling receptacles. All hazardous substances will be disposed of in accordance with the manufacturer and Client’s requirements.

37.0 DOCUMENT CONTROL

37.1 Company Documentation

- All documentation created by, or issued to, Daly Concrete, will be captured and maintained in an appropriate, controlled manner at the Company's Head Office by the Company Secretary. This includes hard copy and electronic documentation relating to work undertaken for the Client. Copies of relevant documents may be made available to the Client as appropriate.

37.2 Subcontractor Documentation

- Subcontractors to Daly Concrete will submit nominated documentation as part of pre-qualification, and may include:
  - Safety, Health and Environment Policies
  - identified responsibilities of key personnel
  - specified induction, training and verification of competency
  - list of hazardous materials and MSDS to be used
  - incident reporting procedures statistics on previous HSE performance
  - insurance details (including Workers Compensation)
  - fitness for work procedure (including fatigue management where applicable)
  - drug and alcohol management strategies
  - preliminary hazard/risk assessment for work scope
  - injury and rehabilitation approach

- Subcontractors are responsible for ensuring that employees they nominated for specific work have the appropriate training and competency, relevant Government qualifications and licensing. Copies of said documentation is to be made available to Daly Concrete upon request.