Site Health, Safety & Environment Manual

Contents

1.0 Overview

1.1. Introduction

The health, safety and welfare of all workers which includes but is not limited to a PCBU, subcontractors, employees and visitors to Fletcher Living's (FRL) building and land development sites is of prime importance to the Company and its management. This includes other people who may be affected by our activities (e.g., members of the public).

Protection of the environment during our activities is also of prime importance which includes the protection of fauna, flora and water courses through the prevention of damage including pollution.

The purpose of this manual is to provide FRL Employees, a PCBU, subcontractors and their employees with guidance and procedures detailing minimum requirements to ensure we protect our people and the environment.

1.2. Scope

This Health, Safety and Environment Management System (EHSM), which is documented in this manual, applies to all sites including Divisions, Branches, Offices, Land Development and Construction Sites of Fletcher Living (FRL) and any other sites under management by the company, along with any project involving its employees, a PCBU, subcontractors and their employees.

Failure to comply with the requirements set out in this manual may lead to appropriate action being taken by FRL management up to and including exclusion from site.

All Site based employees and PCBUs are provided with a copy of this manual during their on boarding and a copy is available electronically on the FRL intranet and on site.

1.3. Purpose

The purpose of this manual is to document the EHS management system of FRL. FRL have implemented a structured safety management system to achieve a consistently high standard of EHS performance. In addition, it will serve to ensure FRL meets its legal obligations, the requirements of Fletcher Building (FB) and the specific requirements of FRL.

1.4. Our Commitment

The guiding principle of the Health and Safety at Work Act 2015 (HSWA) is that workers and other persons should be given the highest level of protection against harm to their health, safety, and welfare from work risks as is reasonably practicable.

The Resource Management Act 1991 (RMA) sets out how we should manage our environment and is based on managing the effects that FRL activities have on the environment so that the environment doesn't suffer.

FRL will meet its obligations under the HSWA and RMA by creating, implementing, and maintaining systems and procedures to ensure we manage our environmental effects and minimize the risk of harm.

This manual, when read in conjunction with FRL's other EHS Policies, procedures and guidance provides minimum requirements and information on how FRL manage EHS in our activities.

FRL demonstrates our commitment to the protection of workers health, safety, and the environment through the development of several policies.

Policies are developed in consultation with health and safety representatives/ council via the health and safety committee meetings/ board or directly. Each Policy is reviewed a minimum of every 2 years. The policies include:

- Protect Environment, Health & Safety (EHS) Policy (Attachment 16.1)
- Drug and Alcohol Policy (Attachment 16.2)
- Sustainability Policy (Attachment 16.3)

All workers shall be made aware of these policies upon Induction. Additionally, they shall be displayed on site.

The company will achieve the purpose and aim of our policy by:

1.5. Responsibilities

Everyone working on our sites has a duty to carry out their work in a responsible manner in accordance with FRL's policy, procedures, and guidelines. Many of which is documented in this manual.

It is imperative that all workers understand and follow the guidelines and safety rules contained in this manual.

Importantly when developing their own Task Analysis (TA) / Job Safety Environment Analysis (JSEA) and Safety, Health and Environment Plan (SHEP), a PCBU and Subcontractors must have procedures in places which meet or exceed FRL's EHS Work Procedures and which comply with applicable legislation.

In addition, a PCBU and subcontractors are expected to contribute to helping maintain and enforce these safety guidelines and rules on site.

We seek your active co-operation in working together with us to maintain a safe working environment. Please discuss any safety matters with our Development Managers, Project Managers, Site Managers, Construction Managers, or Divisional Managers.

1.5.1. The Company

Responsible for ensuring the health, safety, and welfare of our workers whilst at work and the protection of the environment, FRL shall comply with EHS legislation, considering codes of practice and guidelines.

1.5.2. The Management Team

Responsible for:

- Implementing the EHS policies and EHS plan.
- Ensuring compliance by all workers and visitors with regard to both the plan and policies.
- Monitoring the effectiveness of the EHS plan and policies.
- Ensuring the EHS policies and plan are included in the planning phase of any new development.
- Ensuring the development and implementation of suitable Master Site Specific Safety Plans (SSSP) and PCBU SHEPs for each site and PCBU (or suitable equivalents).
- Ensuring accurate reporting of all EHS incidents, including hazard observations, near misses, property/ equipment damage, pollution or injuries.

- Supporting and overseeing incident investigations, which may include leading and/or peer-reviewing investigations, ensuring that effective corrective actions are identified and implemented in a timely manner.
- Supporting and managing the rehabilitation and return to work for employees who are injured or suffering from ill health where reasonably practicable.
- Ensuring critical control verifications (CCV) and/or risk containment sweeps (RC Sweeps) are conducted on all sites.
- Conducting and reporting safety walks.

1.5.3. Project Managers and Site Managers

Responsible for:

- Ensuring EHS safe practices are adhered to.
- Ensuring all workers and visitors comply with the requirements of the EHS policies, procedures and guidelines
- Ensuring compliance with the Master SSSP and PCBU SHEPs for the site and a PCBU (or other suitable EHS management system).
- Conducting regular CCV and RC Sweeps.
- Accurate reporting of all EHS incidents, including observations, near Misses, property/ equipment damage, pollution, or injuries.
- Participating in incident investigations, which may include peer-reviewing investigations, ensuring that effective corrective actions are identified and implemented in a timely manner.

1.5.4. Employees

Responsible for:

- Ensuring they comply with the EHS policies, procedures, guidelines and the EHS plan.
- Ensuring they are competent to perform any work they undertake.
- Take appropriate steps to ensure the health and safety of themselves, others in the workplace and protection of the environment.
- Immediately reporting any EHS incidents including observations, near miss, property/ equipment damage, pollution, or injury to their line manager or EHS team member as soon as practicable.
- Participating in incident investigations, which may include peer-reviewing investigations, ensuring that effective corrective actions are identified and implemented in a timely manner.
- Participating in any rehabilitation/return to work in agreement with the applicable medical practitioners, case Managers and line manager.

1.5.5. A PCBU and other Workers

Responsible for:

- Ensuring they comply with all relevant EHS legislation and regulations.
- Cooperation with other PCBUs/workers to ensure that all work is coordinated to ensure safety is maintained.

- Ensuring their SHEP (or suitable equivalent) for the work to be undertaken is lodged with FRL and approved before contractual engagement and complied with throughout the duration of the contract.
- Ensuring that they (and their workers) are aware of and comply with the requirements of the Site Master SSSP.
- Adhering to the EHS requirements of FRL including the safe work procedures, minimum requirements and Code of Conduct.
- The accurate and timely reporting of EHS incidents including observations, near misses, property/ equipment damage, pollution, or injuries.
- Conducting, supporting, and participating in incident investigations where appropriate, which may include reviewing investigations, ensuring that effective corrective actions are identified and implemented in a timely manner.

1.6. Management Liaison

In matters relating to health and safety, the General Manager of FRL and the Chief Executive – Residential and Land Development are the nominated and authorised officers to speak to external bodies on behalf of the company.

1.7. EHS Legislation

FRL shall ensure a safe and healthy working environment by adhering to the requirements set out in legislation and regulations relevant to health, safety and the environment.

FRL maintain an EHS Legislation Register which documents the legislation, codes of practice and standards which FRL are required to comply. This is identified by maintaining a subscription to an update service (e.g., Safeguard) and by visiting the Worksafe website at least quarterly. This register is reviewed at least annually or periodically if a significant event occurs or when there is a change of process to ensure that it is current.

Any relevant changes/amendments are tabled at the next EHS Leadership Meeting and Health and Safety Committee Meeting for discussion and where appropriate changes to the FRL process are actioned.

Copies of all documents on the EHS Legislation Register is available electronically at either:

http://www.worksafe.govt.nz/worksafe; or

http://www.legislation.govt.nz/

1.8. Reward and Recognition

FRL supports and participates in the FB H&S Award programme to promote, showcase and recognise excellence in H&S performance, innovation, achievements and initiatives.

In addition to this FRL have a site-based reward system which involves individual workers being awarded a 'Green Card' for examples of good practice or initiatives suggested or implemented.

Periodically, individuals who have received Green Cards may be considered to receive a prize and certificate. This will be decided at the EHS Committee Meetings.

2.0 Environment, Health and Safety (EHS) System

2.1. EHS Management System

All FRL activities operate under the guidelines and procedures embodied within the FRL EHS Management System which comprises of an EHS Manual and supporting documents (e.g., policies, procedures, guidelines, and templates).

Access to relevant parts of the FRL EHS Management System is accessible through the FRL intranet.

The applicable site components of the FRL EHS Management System are detailed below and must be implemented at all FRL sites.

2.2. Site-based EHS Components

- The organisation will be defined, and responsibilities delegated.
- A site project Manager and/ or site manager(s) will be appointed to take whatever action is necessary to effectively promote health and safety issues.
- All tasks to be analysed for safe methods of work.
- The FRL Protect Environment, Health and Safety Policy will be displayed on the site.
- The FRL Drug and Alcohol Policy will be displayed on the site.
- A visitors' register will be maintained in the divisional office. Visitors to the site will be inducted / briefed on site safety procedures and site-specific safety hazards.
- Signs warning of the presence of construction and land development hazards, the requirement to wear appropriate personal protective equipment and to report to the site manager will be at central access points to the development and, where applicable, on each lot.
- A site-specific hazard ID board will be prominently displayed at central access points to the development. This will be regularly updated to show any new or different hazards as the development progresses.
- Site emergency procedures will be developed and displayed in site office.
- Site EHS inspections (CCV, RC sweeps, walks) will be performed regularly, with corrective actions to be closed out within agreed timeframes.
- FRL Team meetings will be held at least monthly and will include a primary focus on issues of site safety.
- A PCBU and Subcontractors will be required to complete pre-start assessments, self-inspections, toolbox talks and health and safety meetings at frequencies detailed in their SHEP.
- Compliance with the EHS management systems will be audited periodically.
- A hazard identification and control system will be implemented.
- Contractors, subcontractors and their workers must have obtained a Site Safe Building Construction Passport or a suitable equivalent or higher,
- All workers onsite must have completed the Online (VR) Induction and attended a site-specific EHS Induction prior to commencing work on site.

- All incidents will be reported and recorded in the safety management system (RADAR), appropriate investigations will be undertaken, and corrective action identified and implemented to prevent reoccurrence.
- All work areas must have first aid kits and trained first aiders identified.

2.3. Records

The EHS Records to be maintained and made available on-site in either hard copy or digital include:

- PCBU health and safety management plans (e.g., SHEP)
- Subcontractor health and safety management plans
- Site induction records and/ or access to the company induction dashboard
- Site Specific Hazard register
- Relevant Safety data sheets (SDS or MSDS)
- Incident (accident and near miss) register or access to the company reporting tool
- Incident investigations
- Training and competency register for Employees, a PCBU and Subcontractors including Certificates of competency (powder-actuated tools, scaffolding, plant operators, etc.)
- Workplace inspections including tools and equipment
- Equipment inspection certificates (scaffolds, cranes, mobile plant, lifting gear, fire extinguishers, electrical equipment tagging system, or any other equipment)
- Permits to work (where applicable)
- Health and safety meeting minutes
- Toolbox Talk meeting records – who attended/topics discussed
- Health and safety audit reports / close out of non-conformances recorded via the company reporting tool
- Notifiable Land Development and Construction work submissions
- List of trained first aiders

2.4. Document Control

EHS Documents are controlled centrally in electronic format on the FRL shared drive or additional FRL approved platforms. A register is kept of all current versions of documents. Hard copies of controlled documents may be available on site but are considered uncontrolled once printed.

Workers are required to use the most current documentation available and discard any documents which have been updated and re-issued.

Uncontrolled documents may be used provided they are of equivalent or higher standard than the controlled version or where there is no controlled version available.

This EHS Manual is released as a controlled document.

3.0 EHS Training

3.1. General H&S Training for all Workers

FRL is a member of Site Safe – an independent, not-for-profit organization whose aim is to promote improvements in the Health and Safety practices of the Land Development and Construction industry.

All personnel engaged to perform work on any FRL site must hold a current Site Safe Passport or suitable equivalent level of training or higher.

Workers may be required to produce their passport or other evidence of training at any time while on an FRL site and so must ensure evidence is available.

3.2. H&S Training for FRL Site Workers

All FRL project/ site, construction, divisional, development managers and head office/ branch support personnel with site-based responsibilities shall have completed the Safety Leadership training.

An appropriate quantum of personnel within FRL shall also have completed and be competent in the following:

Workplace First Aid

Fire Warden

Health & Safety Representative

Incident Investigation

Construction Management

3.3. H&S Training for PCBU Workers

All PCBUs, subcontractors and their employees shall hold a Site Safe Building Construction, Civil or Electrical Passport or suitable equivalent as a minimum requirement.

PCBU and Subcontractor Principals / Supervisors are strongly encouraged to attain Site Safe Supervisor Gold Passports or suitable equivalent.

Additionally, it is recommended that at least one member of each PCBU / Subcontractor holds a current Workplace First Aid certificate.

However, if work is conducted over weekends, on public holidays and/ or during holiday periods, at least one member of each PCBU / Subcontractor working **must** be a trained First Aider.

4.0 Induction Procedures

All workers shall be inducted to be able to perform their duties safely and competently while on site.

All PCBU's workers shall be provided with a copy of this manual and/or the FRL Master SSSP for the sites on which they are to work upon initial induction. This manual can be accessed via the Contractor Portal.

In addition to the EHS requirements, all PCBUs are provided with and must agree to the Play Fair – Contractor Code of Conduct as a condition of entry which specifies the desired behaviours while working on FRL sites.

The documentation is to be explained in appropriate detail with the PCBU who is to be provided with opportunity to ask questions and clarify understanding.

All contractors and subcontractors are required to complete a VR online induction using the link/ QR code provided to the contracting company before arrival on site. This is intended to introduce the worker to FRLs Life Saving Rules as well as other generic FRL requirements. Evidence of the VR induction is available on the Supervisor Dashboard and can be verified before the site-specific induction is completed.

A site -specific induction will be provided on site prior to commencing work. This Induction is be provided by an FRL Representative (e.g., Site Manager).

Inductions shall be the responsibility of the applicable FRL project/ site manager, Land Development Contractor Supervisor, or their nominee.

In turn, it is the responsibility of the principal PCBU to induct their own employees and Subcontractors which they have engaged into the content of the information communicated to them during their induction.

4.1. Site-Specific Induction

Site-specific induction on first visit to each project/development shall include:

- Site safety rules / procedures
- Site Hazards / controls (including disclosure of site-specific hazards)
- Emergency evacuation procedures for the siteFletcher Living life saving rules

Upon completion of the site-specific induction all persons shall scan the site-specific induction completion QR code. Records of completed inductions are available on the Supervisor DashboardSite-specific inductions shall be the responsibility of the applicable FRL project/ site manager, Land Development Contractor Supervisor, or their nominee.

- A PCBU, Subcontractors and their employees must be inducted into the PCBUs Safety, Health and Environment Plan (SHEP).
- Inductions shall be the responsibility of the PCBU Principal or their nominee.

4.1.1. Visitors to Construction and Land Development sites:

FRL requires all visitors to FRL Construction sites to be accompanied by an FRL employee or a representative approved by the respective divisional manager. During their time in our workplace, they must always be accompanied to ensure that their health and safety needs are provided for.

Any visitors likely to be regular or visiting for extended periods must receive a site-specific induction to ensure that they are aware of the risks to health and safety and the requirements of FRL as a

condition of entry. Upon receiving an induction, it may not be necessary to accompany the visitor at all times during the visit.

For FRL sites where there is no permanent FRL Representative on site, the main PCBU in control of the site shall be responsible for their workers, subcontractors, and visitors to site's safe access arrangements. This must be documented on their Site-Specific Safety Plan or suitable equivalent.

In emergency situations, it may not be practicable to conduct a formal induction (e.g., for emergency personnel). In this case the person in charge must ensure sufficient information on the hazards, risks and controls is relayed verbally to the visitor prior to entry and where practicable and safe, the person in charge should accompany them to provide direction and assistance as necessary.

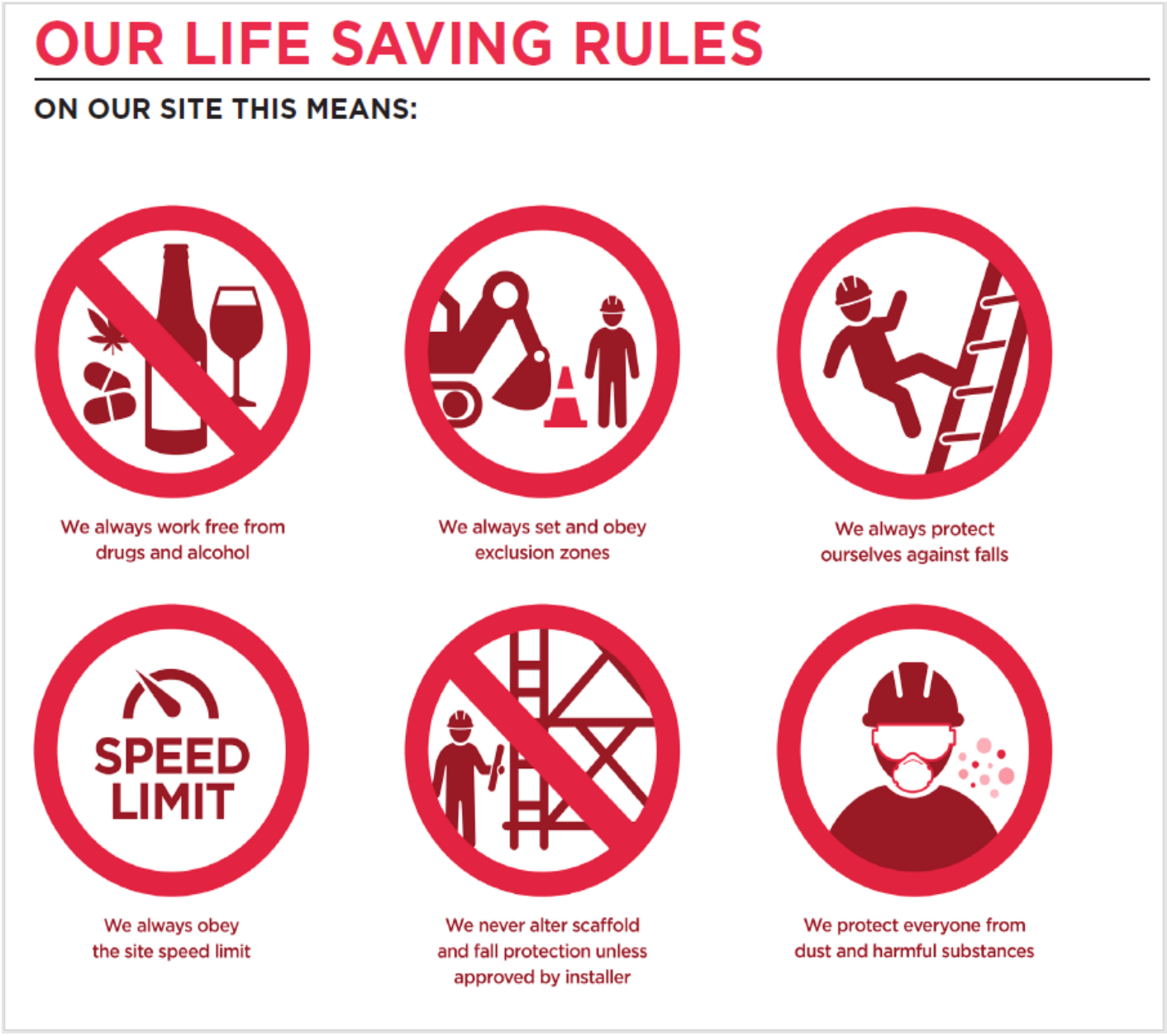
5.0 Life Saving Rules

5.1. Introduction

FRL has developed a set of Life Saving Rules to make sure everyone stays safe at work based on the guidelines set by Fletcher Building, and in consultation with workers and contractors. The Life Saving Rules target specific safety behaviours related to core critical risks on our sites.

We recognise these as being critical for protecting all people at our sites from serious injury or even death.

There are 6 Standard Life Saving Rules that are based on FRL data of high-risk incidents (actual and potential). Following these rules will help keep workers safe:



5.2. Scope

The Life Saving Rules:

- Apply to every person on site – employees, a PCBU, sub-contractors and visitors
- Are simple, direct instructions – everyone should be able to understand and follow them.
- Are stand-alone –independent of any other rules or controls on site.
- Are 100% unambiguous – people don't have to interpret them, or refer to any other documents, to comply with the rules.
- Are an essential part of the health and safety induction
- Are actively promoted on site including by way of site signage, posters, induction content, toolbox talks and periodic communications to site workers. Life Saving Rules are also a focus of site inspections and audits.

5.3. Adherence to the Life Saving Rules

All staff must ensure that their planning and instructions will not result in a Life Saving Rule being broken.

All persons have a right on FRL sites to refuse work that is unsafe and/or cannot be done without breaking a Life Saving Rule.

Project/ site managers should be advised if a situation is encountered in which a Life Saving Rule cannot be followed.

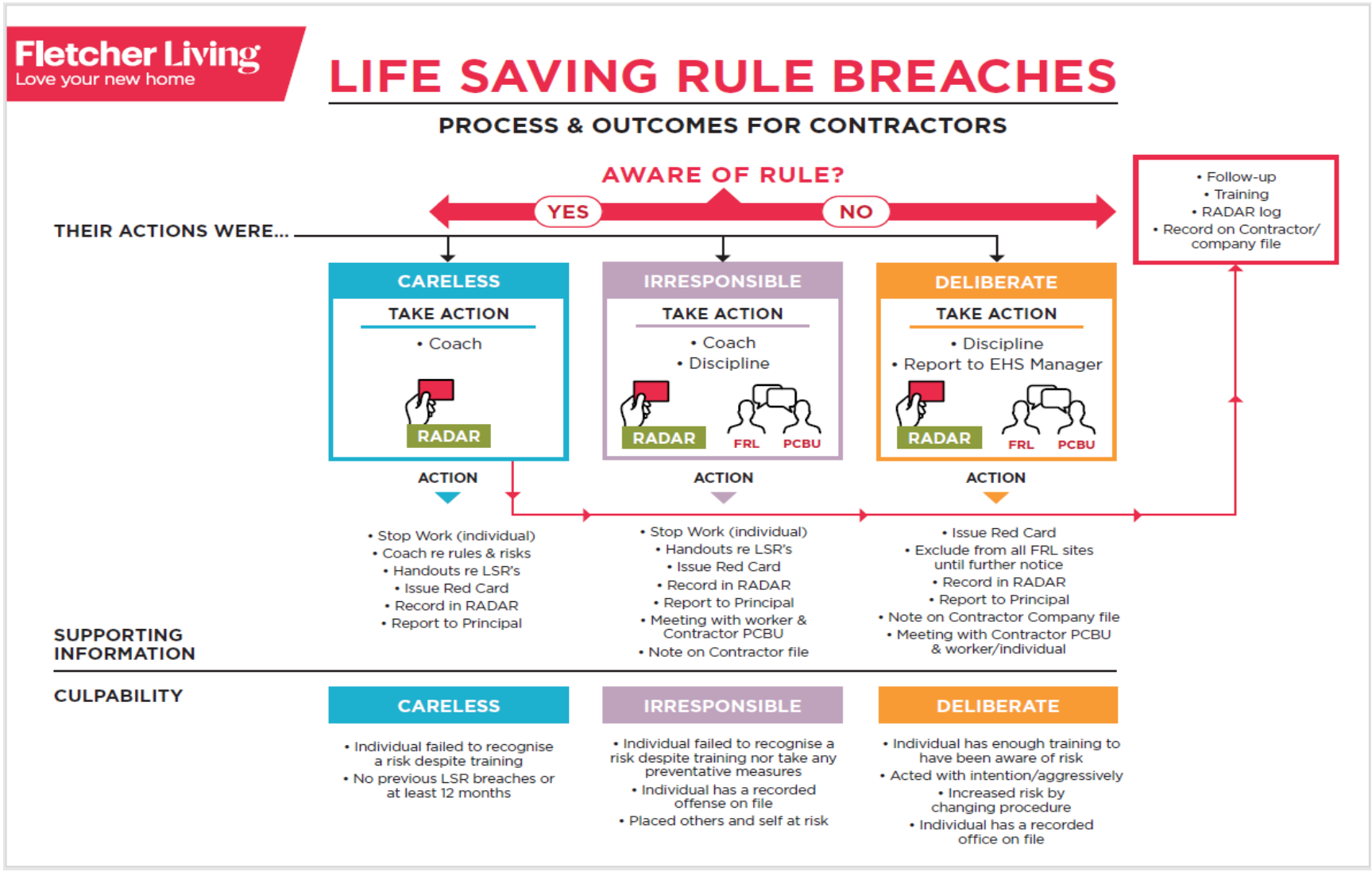
If someone is observed breaking a Life Saving Rule, their unsafe behaviour must be challenged (in an appropriate way) to help keep our sites safe.

All staff will consistently monitor sites closely to ensure that Life Saving Rules are being observed.

Breaches of Life Saving Rules will be investigated. There are potentially very serious consequences for deliberately breaking any of the Life Saving Rules. Workers found to have breached a Life Saving Rule may be excluded from site.

See 5.4 for details.

5.4. Process & Consequences for Contractors on Life Saving Rule Breaches



6.0 Identification of Hazards and Risk Control

FRL are required to have in place an effective program for the identification of hazards, assessment of risk and to put in place effective controls which meets the requirements set out in the Health and Safety at Work Act 2015.

6.1.1. Definitions

A hazard means an activity, arrangement, circumstance, event, occurrence, phenomenon, process, situation, or substance (whether arising or caused within or outside a place of work) that is an actual or potential cause or source of harm; and includes-

I. A situation where a person's behaviour may be an actual or potential cause or source of harm to himself/ herself or any another person; and
II. Without limitation, a situation described in subparagraph (i) resulting from physical or mental fatigue, drugs, alcohol, traumatic shock, or another temporary condition that affects a person's behaviour.

6.1.2. Hazard Identification

The following hazard types should be considered:

- Mechanical: e.g., being caught in or by machinery or equipment, tools.
- Kinetic: Being struck or striking something on same level (e.g., hit by vehicle)
- Gravity: e.g., falling from heights, being hit by falling objects.
- Electrical: Electric shock/fire.
- Chemical: Vapour, mist, gases, dust, fumes, smoke, solvents, acids, pesticides, metals, paints, resins, wastes, spray, by-products, aerosols, flammability, explosives, corrosives, alkalis.
- Temperature: Extremes of heat or cold, local or whole body. E.g., hot objects/cold weather.
- Pressure: e.g., pneumatic/hydraulic, can include wind.
- Noise: e.g., Power tools
- Vibration: Can be whole body (e.g., mobile plant) or local (e.g., power tools)
- Biological: Fungi, bacteria, mites, yeasts, enzymes, infected material, viruses, body fluids, blood.
- Biomechanical: This includes manual handling procedures, incorrectly designed workstations, repetition, weights, lifting.
- Psychosocial: This includes stress, fatigue, drugs and alcohol, work patterns.
- Environmental: This includes heat, temperature, light, distractions, dust, and air-movement.
- Hazardous to the Environment: This includes anything which can pollute the air, land, water or enjoyment of the environment (e.g., nuisance noise or dust).

FRL require all workers to identify the hazards before doing any job or task. This may include a routine or non-routine tasks.

The hazards must be identified particularly when:

- There is a new project or contracted works

- New materials/substances, services or work processes are used.
- New, modified or hired equipment is used.
- Processes/practices are to be modified.
- There are changes which may have modified known hazards or risks.

6.1.3. Risk Control

All sites must have a current Master SSSP which document how EHS risk is to be managed on site. This includes a Risk Register which identifies and documents the specific risks and the works to be conducted. A PCBU may in addition have their own Risk or Hazard Register.

Where the hazard is recorded in the Site Specific or FRL Risk Register as the potential for 'major' or above severity, the controls must be adhered to.

Where all the controls cannot be implemented in their entirety or the hazard is not listed in the register, the hazard, risk assessment and controls to be used must be documented (e.g., in a Task Analysis or similar) and signed by those involved and a copy provided to FRL for consideration and inclusion to the Risk Register where applicable.

The Risk Register and/or Task Analysis (TA) where applicable must be available to all workers who are involved in the task.

Where significant changes to the Site-Specific Risk Register are required (e.g., inclusion of a new risk or addition/removal of significant controls), this must be documented and submitted to FRL for consideration and approval.

6.1.4. Task Analysis

Planning for safety ensures safe work practices are predefined so that work is carried out safely and efficiently which increases productivity. FRL employees and a PCBU working on Land Development and Construction sites shall complete a Task Analysis (TA) or suitable equivalent (e.g., Lift Plan) using the risk rating pre-control.

To ensure understanding of the controls, all workers involved in the task must be involved in and/or fully briefed on the TA. The following five step process outlines how to complete a task analysis:

1. Break the job down into sequential key steps. Normally not more than five or six.
2. Brainstorm the possible hazards associated with each key step. Avoid prejudging suggested hazards.
3. Determine the risk(s) associated with each hazard and practical control(s) using the hierarchy of control.
4. Allocate responsibility and implement the agreed controls.
5. Follow-up and monitor the controls to ensure relevancy and effectiveness.

FRL requires all Task Analysis and Safe Task Procedures to be reviewed at least annually or as and when required i.e. process changes the circumstances require by the PCBU.

Every review of the documents must be communicated to all workers involved in the task.

6.1.5. Determine Risk Rating

All identified hazards shall be assessed with regard to their potential to cause harm and the type of harm likely. These are to be detailed in the Site Specific and FRL Risk Registers.

- It is the responsibility of the Senior Leadership Team to ensure that assessments have been carried out in their areas of responsibility.
- All assessments of risk or likelihood must be conducted in consultation with employees from the area/s where the hazard/s were identified.
- Employees will be trained and/or suitably experienced to assess the risk and identify the practical controls for a task analysis.

Each hazard is then evaluated to determine its Risk Rating. The 2 factors to be considered are:

- Severity: What is the most probable impact?
- Likelihood: What are the chances of the event occurring?

The Hazard assessment table will calculate the Risk Rating for the hazard based on the severity and likelihood ratio.

6.1.6. Risk Controls

The control hierarchy of preferentially trying to eliminate a risk, if not possible then to minimise it. The agreed controls must be implemented to be effective. If the hazard or risk cannot be eliminated, there will generally be some form of ongoing minimisation procedures to control the risk to an acceptable level.

Minimising the risk should include consideration and application of where applicable:

- Substitution for a safer alternative.
- Isolation, e.g., physical barriers/guards.
- Engineering controls, e.g., interlock guards, safe by position controls.
- Administrative controls, e.g., training, procedures.
- Personal Protective Equipment, e.g., hard hat, hi-vis, safety footwear, gloves.

All risks must be controlled, to the highest extent practicable, once they have been identified.

If a risk is scored as Very High, discontinuing the operation until additional controls are implemented to reduce the risk should be considered as an option.

6.2. Risk Review

If a hazard has a “High” or” Very High” rating, the controls must be reviewed no less than 6 monthly and further controls considered to reduce the risk to as low as reasonably practicable. This is recorded in the FRL Risk Register and/or Site-Specific Risk Register.

7.0 Managing High Risk Tasks

High risk activities are to be carefully planned and executed (including giving due consideration to applicable Regulations, Approved Codes of Practice, Worksafe Guidelines and Industry standards).

Activities must be closely monitored and may be escalated to the level of requiring permit to work systems, if the circumstances require it. Activities which may fall within this scope include:

- Erecting, altering or dismantling Scaffolding
- Working at height with potential to fall (e.g., with harness/net/fall bag or similar for protection)
- Working on roofs
- Crane or load-lifting operations
- Work with asbestos
- Working in confined a space
- Mobile Plant and equipment
- Work within 4m of overhead power lines
- Work within 1m of underground utilities
- Demolition work
- Work in an excavation
- Concrete pump operations
- Pre-cast concrete panels
- Use of powder-actuated tools
- Hot work
- Work requiring electrical certification
- Work requiring a certificate of competence

A PCBU undertaking any of the above activities are expected to have detailed task analysis, competence register and emergency management plans. These will be subject to greater scrutiny by FRL Managers in approving their SHEP.

7.1. Permit to Work systems

A PCBU may apply their own Permit to Work systems or use the FB system which are to be detailed within their SHEP and should typically include the following high-risk tasks:

- Excavations and digging (FRL permit only)
- Confined space entry by competent persons only
- Hot Work
- Weekend Work (FRL permit only)

7.2. FRL Specific Requirements

For many common high-risk tasks FRL have documented minimum requirements to be implemented/adhered to while working on FRL sites. This may exceed the requirements documented by legislation, code of practice or guidance.

The requirements are communicated to PCBUs during the on-boarding process and throughout engagement through a variety of means. This includes:

- Induction documentation
- Safe Work Procedures (Pictograms) of specific equipment/tasks
- Engagement Meetings
- Toolbox Talks

All workers and visitors to site are made aware of the specific requirements upon Induction.

It is the responsibility of the PCBU to ensure that their workers (and Subcontractors) are aware of, agree to, and adhere to the requirements.

All visitors to site are required to adhere and will be made aware upon Induction by FRL.

7.2.1. Drugs and Alcohol

FRL is committed to providing a safe workplace for all. Workers impaired by drugs and/or alcohol can present a significant risk to themselves and all other workers, visitors and members of the public.

FRL has a legal obligation to protect the health and safety of all workers and visitors to FRL sites. More importantly, meeting such an obligation is also a fundamental matter of core values. In the same way, all workers have an obligation to protect their own health and safety and to ensure that no action or inaction on their part will cause harm to any fellow worker, visitor or member of the public while at work.

The Drug and Alcohol Policy is provided to all PCBUs during on boarding and is available to all workers upon Induction and request. It is the responsibility of all PCBUs to ensure that all their workers (including Subcontractor workers) are familiar with and agree to participate in the programme as a condition of entry to FRL sites.

The Drug and Alcohol Policy will include the following situations:

- Pre-employment (FRL employees only)
- Internal Transfer (FRL employees only)
- Random
- Reasonably Cause
- Post Incident

Any worker who refuses to participate in testing upon request may be excluded from site and/or work with FRL.

7.2.2. Traffic Management

All FRL sites are required to have a Traffic Management Plan specific to the site. This is to manage vehicle movement and to minimise the risk of vehicle and pedestrian collision. Components of the traffic management plan include:

- Entry/Exit

- Vehicle Direction and traffic flow (reduction of reversing manoeuvres and one-way direction)
- Parking (reduction of blind spots for pedestrians)

All workers and visitors to site (including delivery vehicles) are made aware of the Traffic Management Plan upon Induction and may be provided with a copy upon request. In addition, suitable signage is provided throughout the site to inform of specific requirements (e.g., direction or speed limits).

The Traffic Management Plan complies so far as reasonably practicable with the requirements of the 'Workplace Traffic Management' Factsheet, Worksafe 2016.

7.2.3. Mobile Plant

All mobile plant on site presents a risk to those in the vicinity, including operators. Mobile plant includes but is not limited to cranes, hiab's, excavators, loaders, bobcats, concrete pump operations etc.

FRL require that a suitable exclusion zone is established and maintained to prevent pedestrians encroaching the operating zone during operation and movement. Entry into the exclusion zone must be appropriately managed (i.e., only when authorised by the operator of the plant and if the plant is stationary).

All workers and visitors to site are required to remain outside exclusion zones at all times.

All mobile plant must be operated by competent operators who are appropriately licenced where applicable. The equipment must be fit for purpose, in good working order and be equipped with appropriate safety devices including roll over/tip over/falling object protective structures, audible reversing alarm and amber flashing light.

All work with mobile plant must comply with the requirements provided in 'Keeping Safe around Moving Plant' Factsheet, Worksafe 2014 and 'Operator Protective Structures on Self-Propelled Mobile Mechanical Plant' Approved Code of Practice, Worksafe, 1999. Other guidance may also be relevant and should be consulted (e.g., 'Approved Code of Practice for Cranes', Worksafe, 2013) where applicable.

7.2.4. Work at Height

All work at height must be authorised by FRL where applicable and supported by a written Task Analysis (or similar). This includes the task to be undertaken and the selection of suitable fall prevention. This includes all work using a scaffold, ladder or work platform. All work at height must comply with the requirements of the 'Working at Height in New Zealand' Best Practice Guidelines, Worksafe, 2012.

<u>Scaffold</u>

When accessing a scaffold, all workers must ensure that the scaftag is in place and certifies the scaffold as safe. Where it shows as unsafe, it must not be accessed and where missing, it must not be accessed but in addition the condition must be reported to FRL so that it can be rectified.

Scaffolds must be used safely at all times which include but is not limited to:

- Keeping within the confines of the rails
- Stacking safely (so the load cannot fall off the edge, or is overloaded) and not obstructing access
- Not throwing items from the platforms
- Not altering the scaffold in any way (i.e., report to FRL when you require alteration).

Scaffolding erection, altering, dismantle and use must comply with the requirements of the 'Scaffolding in New Zealand' Good Practice Guidelines, Worksafe, 2016.

Ladders

Ladders are for access or short duration work only. Where there is a suitable alternative platform, this must be used instead. Ladders, where used, must be industrial grade, suitable for the task (e.g., long enough with top two steps clear), set up correctly and in a safe condition (check it first). No three step ladders are allowed on site.

Ladders must be used safely, facing the work activity i.e., no leaning sideways or loading sideways. Angle straight ladders at a 4:1 ratio, secure at the top, foot at the bottom and maintain three points of contact. Use stepladders with platform and handrail or if no platform, leave top two steps clear.

All work with ladders must comply with the requirements of the Acceptable ladders and work platforms guideline.

Temporary Work Platforms

Appropriate temporary work platforms must be used where scaffolds and edge protection are impracticable. All working platforms must be constructed, used and maintained in accordance with 'Temporary Work Platforms' Factsheet, Worksafe referencing the Residential Working at Height Guidelines issued by FRL.

Edge Protection

Edge protection must be provided where there is a risk of a fall from exposed edges of excavations, from or through the structure of a roof or mid-floor. Guardrails must be supplied to all exposed edges: stairs must be planked-out and fall bags/nets provided as supplementary controls.

Roof Access

Access to the roof must be via a safe method, reducing the risk of a fall. This will comprise of a landing or platform (where practicable no greater than 500mm in height) to the top of the roof fascia. This will ensure that the step-up is minimised and is to be constructed from the scaffolding equipment used. A suitable equivalent alternative solution may also be considered.

Safety Nets

Safety Nets are designed as a fall protection device and not as an access way. To ensure that they can be effective in the event of a fall, workers are required to adhere to the following requirements:

- Use safety nets only as a means of fall protection (do not walk on them or store items).
- Do not untie, remove or alter installed nets (only Net Provider is authorised to do this).
- Do not enter netted area (in case there is a fall of person or item) except in emergency i.e. to conduct rescue of person only.
- Where debris or items need to be removed this must be done by the Net Provider (to prevent damage to the net and to check integrity of the net).
- Where a fall has occurred and the net has been used (or compromised by a falling item), the Net Provider must be informed immediately to withdraw the net and replace.

The installation, maintenance of Safety Nets must comply with the 'Safe Use of Safety Nets' Best Practice Guidelines, Worksafe 2014.

7.2.5. Overhead Work

Overhead work includes but is not limited to: Cranes and load lifting/positioning, Roof work and work from Scaffolds.

All Overhead work, where there is a risk of an item falling from height must include an appropriate exclusion zone to minimise the risk of a person being struck (as per 7.2.4 Mobile Plant) should the item fall. This includes consideration of wind strength/direction and foreseeable fall/roll directions.

Workers and Visitors are to ensure that they remain outside of the exclusion zone at all times the work is being undertaken.

All overhead work must be conducted in compliance with the relevant guidance e.g., 'Approved Code of Practice for Cranes', Worksafe, 2013.

7.2.6. Stacking/Storing

Stacking and storing includes any items/material or equipment which is to be positioned on site ready or in preparation for use, storage or collection/dispatch.

Stacked items falling onto people is a high risk particularly where the item is heavy and/or intrinsically hazardous (e.g., sharp items, chemical properties).

All loading of material must be authorised by FRL where applicable and be in accordance with safe storage practices which take into account the variables of the site, the load, the weather/environment, the tasks, other workers requirements and the people at risk (e.g., public).

Coordination with other PCBUS/workers may be required to ensure that any disruption to their work is minimised.

7.2.7. Working Alone

It is an FRL requirement that workers do not work alone when conducting high risk activities. Examples include but are not limited to: Accessing a roof, working in a restricted place, loading/unloading using a crane/Hiab for examples.

Authorisation from FRL with appropriate Task Analysis or similar is required for working alone for low-risk tasks. Sales staff working alone is required to be trained in the procedures established to mitigate the risk of working alone i.e. the use of the Go Duress pendant and emergency procedures

7.2.8. Excavations

Ensure that all Excavations are sufficiently protected (e.g., from cave-in or falls into) and are provided with a safe method of entry and exit. All excavations must adhere to the requirements of the 'Excavation Safety' Good Practice Guidelines, Worksafe 2016.

7.2.9. Power Tools

Power tools include all hand-held tools operated using a power source (e.g., electricity, petrol, diesel, air, powder-actuated etc.).

All Operators must be competent to use the equipment safely or be adequately supervised (i.e., in the case of new or younger workers, direct supervision may be required to ensure their safety and the safety of others around them). Competency includes knowledge of:

- Selection of the most suitable tool
- Correct set up including pre-start checks on tool, exclusion zones, signage etc.
- Guards and safety devices e.g., physical guards, dust extraction, audio/visual signs etc.
- Personal Protective Equipment required (e.g., chaps for chain saw, face shield for grinder).
- Adjustment for the work piece/environment etc.
- Safety during use.

- Safe shut down and make safe.
- Maintenance/storage of the tool/blade etc.

All workers using power tools must be identified on the PCBU training matrix including their competency status and supervision requirements.

7.2.10. Use of all power tools must be in accordance with the corresponding guidance. Electrical Work

All electrical work must be completed in compliance with the Electricity Act 1992 and associated regulations (e.g., the Electricity (Safety) Regulations 2010).

All electrical (including temporary supplies) work must be completed (i.e., installed, connected or modified) by a licenced electrical worker. Prior to use the installer, electrician must provide:

- A Certificate of Competence (CoC)
- An Electrical Safety Certificate (ESC)
- A Record of Inspection (RoI)

All electrical work must be conducted using a task analysis including suitable isolating procedures (Lock-out Tag-out) to ensure that all workers (and others in the area) are suitably protected from exposure to live electrical parts. The process must also include prevention of unauthorised persons being able to connect power and suitable signage in inform of status.

Temporary supply switchboards should be readily accessible and attached to a permanent wall or structure that has been designed for the purpose. Pole or post mounted temporary supply switchboards should be fixed by means of coach screws or bolts. Where installed in outdoor locations, boards should be constructed so that safe operation is not impaired by the weather. All boards should be protected from damage throughout use.

To minimise the risk when installing temporary power, FRL, where applicable, require the Installer to position the earth peg inside the property boundary where practicable. This is to minimise the risk of the earth peg striking live cables/other utilities which are normally positioned approximately 900mm depth on the outside the property boundary in the road reserve. Visual markers (i.e., position of lamp posts, junction boxes, meters etc. can also provide guidance as to the path of cables).

7.2.11. Hazardous Substances

All hazardous substances used on site, and where applicable introduced by FRL, are detailed in a Hazardous Substance Register which is held on site and is available to all workers. The corresponding Safety Data Sheets (SDS) are also available.

All PCBUs/Subcontractors are required to detail any hazardous substances they use on site in their SHEP or Site-Specific Safety Plan (or similar) including a copy of the SDS. This must be available to FRL and to other workers who may be affected by the substance.

All hazardous substances must be handled, stored, used and disposed of in accordance with the SDS including the use of any applicable Personal Protective Equipment.

If a specific emergency response in relation to the substance is required (e.g., spill procedures), these must be developed in consultation with FRL where applicable and detailed in the SHEP (e.g., contained within the Emergency Procedures) and a copy provided to FRL.

8.0 Personal Protective Equipment

If Personal Protective Equipment (PPE) is necessary as a risk control, the PCBU is to ensure that the equipment is either available for use or issued to their workers who may require it.

Where the risk control requires the use of safety equipment, the required item(s) of safety equipment will be listed in the Risk Register with the control for each hazard.

All personal protective equipment shall comply with the relevant NZ or equivalent international Standards.

PCBUs have a responsibility to ensure that all their employees and Subcontractor workers are issued with the appropriate PPE and clothing as required.

When issued, workers should be provided with the information required to maintain the PPE to the required standard (e.g. storage), when (e.g. expiry, damage, wear), how to replace and trained in its use.

All workers must wear the following when visiting or working sites:

8.1. Compulsory on all sites:

8.1.1. Hi-Vis

A Hi-vis-vest/clothing approved to *AS/NZS 4602.1 High Visibility Safety Garments* is to be worn by all personnel at all times while on FRL work sites.

Hi-vis garments shall meet the Class D/N standard for visibility in both day and night. They shall be manufactured of a fluorescent background material and incorporate a retro-reflective strip.

8.1.2. Safety Footwear

Appropriate protective safety footwear approved to AS/NZS 2210.3 Occupational Protective Footwear is to be worn by all personnel at all times while on FRL work sites. In almost all cases this requires non-slip footwear with protective toe caps and penetration-proof soles.

For personnel undertaking works on roofs, appropriate safety footwear would comprise lightweight, soft-soled shoes. This applies only when on the roof. In all other situations (e.g., travel through the site) footwear compliant with AS/NZS 2210.3 must be worn.

For personnel working with wet concrete, appropriate safety footwear would comprise water-proof rubber boots.

For personnel working in finished homes which are ready to be handed-over for sale, appropriate safety footwear would comprise closed-toe shoes.

8.1.3. Head Protection

Hard Hats – approved to AS/NZS 1801 Occupational Protective Helmets (or equivalent international standard) must be worn by all workers on site at all times except:

- When a suitable risk assessment has been conducted by the PCBU which concludes the risk is no higher than 'low'.
- The risk assessment must consider both the likelihood of head injury occurring and the potential severity of injury should an incident occur and adequately reflect the task and the circumstances on the site at the time.
- The risk assessment must contain suitable controls where there is a (low) risk of head injury where applicable.
- The risk assessment must be suitably documented and authorized by FRL prior to implementation and a copy must always be available on request on site it is valid.
- All workers involved in the task must be briefed on the risks and the controls and must sign onto the risk assessment document (or equivalent, e.g., JSEA/TA) prior to implementation on site.
- Compliance with the policy and the risk assessment is monitored and managed by the PCBU.
- FRL shall have discretion to rescind this exemption if in their judgment the risk of head injury has not being correctly identified or adequately assessed or when this policy has been breached.

Bump caps are not considered a suitable replacement for a hard hat, as:

- A bump cap is a lightweight hard-topped hat using a simplified suspension or padding and a chin strap.
- Bump caps are used where there is a possibility of scraping or bumping one's head on equipment or structure projections, but they are not sufficient to absorb large impacts, such as that from a tool dropped from several storeys.
- A bump cap is intended only to protect the wearer from static objects (e.g., walking into low ceilings or hanging obstructions). To meet the requirements of BS/EN812, testing is carried out using a lower energy level – a five-kilogram striker is dropped on the helmet from 250mm, with a maximum transmitted force of 15kN.

Beanies or other caps are not to be worn under hard hats as they can reduce the effectiveness of the seals of earmuffs or interfere with the correct fitting of the hard hat and are not approved by Worksafe NZ. However, Merino Thermal Hard Hat Liner (NZ Safety Code 407032) may be worn under the hard hat if needed for warmth. "Hoodies" must not be worn, either with or without hard hats, as they restrict peripheral vision.

Turbans are not considered a suitable replacement for a hard hat, nor may hard hats be worn on top of turbans, although a "Patka" may be worn under a hard hat as an alternative. The Health and Safety at Work Act 2015 (HSWA) does not exempt workers from wearing personal protective equipment on religious or cultural grounds. People at work, or at a workplace, should not be exposed to

increased risks because their religious or cultural attire makes eliminating or reducing risk difficult. This means in most cases a PCBU will need to place their workers' health and safety ahead of any concerns about religious or cultural attire.

8.1.4. Gloves

Protective gloves approved to AS/NZS 2161 Occupational protective gloves shall be worn where there is the potential for hand injuries.

This includes but is not limited to when manual handling rough or sharp-edged material or any material with the potential to splinter; when handling treated timber, or when handling hazardous substances, including solvents, paints, adhesives, and corrosives.

8.2. Task/Environment Specific PPE

The following task or environment-based PPE requirements shall apply in addition to the minimum requirements detailed above.

8.2.1. Eye protection

Eye protection approved to *AS/NZS 1337 Eye Protectors for industrial Applications* shall be worn by all personnel where there is the potential for a foreign object or substance to enter the eye and cause injury.

Medium impact safety glasses (clear or tinted) shall be the minimum requirement. Higher levels of eye protection may be required dependent on equipment the operator is using.

A high-impact transparent visor shall be worn when working with power cut-off saws, chainsaws, or disc grinders.

A shade-10 helmet with arc flash filter shall be worn when welding. Shade 5 goggles shall be worn when gas cutting.

8.2.2. Hearing protection

Hearing protection approved to AS/NZS 1269 Occupational Noise Management and AS/NZS 1270 Acoustics – Hearing Protectors shall be worn by all personnel where a significant noise hazard exists.

This includes but is not limited to table / handheld saws, power cut-off and chain saws, impact drills, excavators, concrete pumps, skid-steer loaders, powder-actuated tools, nail guns, air compressors, etc.

Hearing protection must be of the correct grade (Class 1 – 5) as required by the task being undertaken.

8.2.3. Dust mask (required for nuisance dust)

Respiratory protection approved to AS/NZS 1716 and AS/NZS 1715 shall be worn where there is the potential for other airborne contaminants to be inhaled. This includes but is not limited to, hazardous substances, dusts, fibres, plasters, solvents, paints, mould and fungal spores. As a minimum a disposable P1 or P2 particulate or carbon respirator (as applicable) shall be worn.

A P2 particulate respirator must be used when moulds or fungi are present. A P3 particulate respirator must be used when working with asbestos. Note: other strict requirements apply to asbestos.

Ensure the correct respirator is used for the job having regard to the toxicity, exposure and duration (refer the product Safety Data Sheet).

8.2.4. Respirator

All Personnel machining products or materials containing silica (including fibre-cement board, concrete, bricks, and blocks, tiles, stone, or sand) must wear appropriate respiratory protective equipment (RPE) as detailed below or as specified within the Safety Data Sheet applicable to the material being machined. Where requirements or standards differ, personnel shall meet the higher standard.

This requirement also applies to personnel who are exposed to airborne contaminants as a result of silica machining within their work area, even though they may not be directly engaged in the task.

A P2 disposable respirator (face mask) shall be worn as a minimum for low dust levels. For medium to high dust levels a half or full-face P2 respirator must be worn. Where dust levels are excessively high, exposure is for a sustained period, or where the user's respiratory functioning is compromised (for example, by a medical condition) higher levels of RPE must be selected.

Dust masks and respirators shall comply with AS/NZS 1715 Selection, Use and Maintenance of Respiratory Protective Devices and AS/NZS 1716 Respiratory Protective Devices.

Where workers are required to wear respiratory protection, an annual facial fit test must be carried out for each worker and training provided on the correct use of respirators. Respirators should be cleaned and maintained to ensure they remain fit for purpose and stored in an airtight container away from light and contaminants.

Respirators should be used together with other dust control methods, not as the primary way to prevent exposure to silica dust.

8.2.5. Harness

Safety Harnesses approved to AS/NZS 1891 – Industrial Fall Arrest Systems and Devices must always be worn when work is being undertaken at height using either fall restraint or fall arrest systems.

As a minimum scaffolders shall always be required to wear safety harnesses when erecting scaffolds and when not utilising the Advance Guardrail ("tunnelling") method.

8.2.6. Protective clothing

Protective clothing or overalls should be worn in environments where there is the potential for contamination of skin or clothing by exposure to dusts, concrete splashes, solvents, paints, etc.

8.2.7. U.V Protection

Sunscreen, sunhats and/or hard-hat brims and neck flaps shall be worn where there is the potential for over-exposure to UV light.

Precautions should be taken any time when working outdoors.

8.2.8. Other PPE

Other forms of PPE may be required dependent upon task and environment. Consult Safety Data Sheets, Codes of Practice, Worksafe Guidelines, applicable NZ, and international standards to determine requirements.

8.3. Exposure Monitoring and Health Surveillance

FRL undertakes both exposure monitoring and health surveillance on its sites and employees. This assists FRL in determining whether the hazard controls are suitable and effective.

Exposure monitoring involves monitoring of the work environment to quantify exposure to a hazard (e.g., dust or noise) and compare with the applicable Workplace Exposure Standards (WES).

PCBU workers are exposed to many hazards which may affect their health if not adequately controlled e.g., dust/noise/fumes. These workers should be offered routine health monitoring by their employer as set out under the Health and Safety at Work Act 2015.

9.0 Training, Competency & Supervision

9.1. Task Training

All workers must be trained or appropriately supervised to carry out their work with competence. It is the responsibility of the PCBU and the worker to ensure such instruction is provided and understood.

Training includes the provision of appropriate information, instruction, demonstration, supervision, and verification that the trainee has retained the information to conduct the task safely and can demonstrate this to the trainer.

The type and format of training depends on the tasks and the risks associated with it, but it is expected that where formal training is available, it is provided, and where no formal training is available, it is provided by a suitably competent person in the task.

It is everyone's responsibility to ensure all new workers are assisted in working safely.

9.2. Competency

FRL requires that a documented assessment of a person's competency is completed or submitted for all tasks. A Competent person has, through a combination of training, education, and experience, acquired knowledge and skills enabling that person to correctly perform specified tasks. It will be based on training, experience and knowledge and is also measured through the legislative and standard practices and identified requirements.

This must be recorded on a training/competency matrix or similar and be readily available where and when the task is being conducted.

9.3. Supervision

Supervision for workers undergoing on-job-training must be provided by experienced workers. Those providing the training will have sufficient knowledge in the specific requirements of the role (e.g., either currently conducting, or previously conducted the role to a high standard).

Direct Supervision must be provided for new workers conducting high risk tasks for a suitable period to ensure that the PCBU and FRL where applicable, are confident of their competency and that they are safe to work unsupervised. Examples of this include but are not limited to: Work with power tools, mobile plant and equipment and/or electrical work, confined spaces.

10.0 Incident and Injury Reporting, Recording & Investigation

All workers are required to report all accidents, incidents or which includes those causing injury, pollution, property/ equipment damage, near miss events or hazards identified to their line manager and/or EHS team member as soon as practicable so that they may be appropriately investigated and managed to prevent worsening and/or recurrence.

All Managers including PCBUs are responsible for ensuring that all workers on FRL sites are familiar with and understand this requirement.

10.1. Definitions

10.1.1. Incident (Accident including Near Miss)

Any unplanned event that occurred at the workplace that resulted, or had the potential to result, in an injury or disease or discharge to the environment. This includes any:

- Injury or illness occurring as a result of a work task/the work environment.
- Any discharge to the environment
- Any incident causing damage to plant/equipment/environment
- Near miss events where no injury, ill health or damage occurred but could have done in slightly different circumstances.

Reported incidents should not include absent or failed hazard controls, unless associated with an incident.

10.1.2. EHS Concern (Hazards)

A concern an individual or team has that a situation (e.g., state of equipment, e.g., scaffold, plant) or work-related behaviour (e.g., failure to follow safe work practices or wear appropriate PPE) has the potential for someone to be hurt or the environment damaged.

10.1.3. Serious Incident

An incident causing, or with the potential to cause, Serious Injury.

10.1.4. Serious Injury

An injury or illness that requires a person to have:

- Immediate treatment as an in-patient in a hospital for more than 24 hours or
- Immediate treatment for:
  - The amputation of any part of the body; or
  - A serious head injury (fractured skull, loss of consciousness, blood clots or bleeding of the brain, damage to the face); or
  - A serious eye injury (loss or partial loss of sight, object penetrating the eye, substance exposure which poses a risk of serious eye damage); or
  - A serious burn (requiring intensive care or critical card); or
  - Separation of the skin from underlying tissue such as de-gloving or scalping (separation of the skin from underlying tissue such that a tendon, bone or muscle are exposed); or

- A serious spinal injury (for example, injuries to the discs and/or spinal cord); or
- Serious loss of body function i.e., loss of consciousness, loss of movement of a limb or the loss of the sense of smell, taste, sight, hearing, or function of an internal organ; or
- Serious laceration (laceration that causes muscle, tendon, nerve, or significant blood vessel damage or permanent impairment); or
- Medical treatment within 48 hours from exposure to a substance; and
- Any infection to which carrying out work is a significant contributing factor (micro-organisms, contact with human blood or body substance) and which requires an extended period of recovery.
- Medical treatment for gradual onset of serious occupational-related illness and/or disease resulting from prolonged workplace exposure to workplace substance or materials, such as asbestos.

10.1.5. Lost Time Injury (LTI)

A work-related injury or illness that results in time lost from work of one full day/shift or more.

10.1.6. Medical Treatment Injury (MTI)

A work-related injury or illness that requires medical treatment beyond First Aid, including a patient being managed or cared for by a doctor or health care professional for the purpose of combatting disease or injury.

The following are NOT considered medical treatments:

- Visits to a doctor or health care professional solely for the purposes for observation or counselling.
- Diagnostic procedures (e.g., X-ray,electrocardiogram (ECG)), including administering prescription medications that are used solely for diagnostic purposes.
- Any procedure that can be labelled first aid (e.g., applying dressings).
- Prescription issued for preventative purposes such as antibiotics with no infection evident (or prior to infection setting in).

10.1.7. First Aid Injury (FA)

An injury incident that requires only one or more of the following types of treatment:

- Using non-prescription medications at non-prescription strength
- Administering Tetanus Immunisations
- Cleaning, flushing, or soaking wounds on the skins surface
- Using wound coverings, such as bandages, plasters, gauze pads or using wound strips or butterfly bandages.
- Using hot or cold therapy
- Using any non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts etc.
- Using temporary immobilization devices which transport an injured person (e.g., splints, slings, neck collars or back boards)

- Drilling a finger/toenail to relieve pressure or draining fluids from blisters.
- Using eye patches
- Using simple irrigation or a cotton swab to remove foreign bodies not embedded in or adhered to the eye.
- Using irrigation, tweezers, cotton swab or other simple means to remove splinters or foreign material from areas other than the eye.
- Using finger guards
- Using massages
- Drinking fluids to relieve heat stress.

10.1.8. Level 1 Incident (Insignificant/Minor)

An incident which has resulted in:

- No injury, minor damage, near-miss and hazard.
- An insignificant or minor injury up to and including First Aid treatment.
- An onsite or offsite environmental release which has been contained and cleaned up with internal resources resulting in no significant short term or long-term damage.
- Financial or Reputational Loss of less than $10,000.

10.1.9. Level 2 Incident (Moderate)

An incident which has resulted in:

- Medical Treatment or Lost Time Injury (not including Serious Injury)
- Environmental release which requires specialist assistance to remedy and causes damage to items of ecological or cultural significance.
- Financial or Reputational Loss of up to $100,000
- Minor enforcement by regulator against company.

10.1.10. Level 3 Incident (Major)

An incident which has resulted in:

- A Serious Injury
- Environmental release with major short-term negative effects or major damage to items of ecological or cultural significance.
- Financial or Reputational loss of up to $500.00
- Prosecution against company
- Negative local publicity

10.1.11. Level 4 Incident (Catastrophic)

An incident which has resulted in:

- Fatality
- Toxic release onsite or offsite with detrimental long-term effects.

- More than $500,000 loss
- Prosecution or significant restriction on operational activities against company
- Negative national publicity

10.2. Injury Management Process

Where a person(s) is injured, the priority is to provide immediate First Aid. All FRL project/ site managers are trained in First Aid. PCBUs are required to supply a training matrix with their SHEP which details their workers training including First Aid.

It is recommended that an injured person is treated by a trained first aider for all injuries. Where the injured person is a First Aid trained person, it is recommended that the person seek the assistance of another trained person. This is to ensure that the opinion of the injury and the treatment is independent and non-bias (assessing and treating your own wound is difficult when in pain). It also reduces the risk of the injury being over or underestimated in severity and provides assurance that the person has received appropriate support and treatment.

Where the injury is deemed serious enough to warrant the attention (or opinion) of a medical practitioner, the injured person should be seen as soon as practicable.

Where a work-related injury is to a contractor or sub-contractor worker, the injury is managed either by their employer (if they are an Accredited Employer) or directly by ACC. FRL encourage our PCBUs to partake in rehabilitation where practicable.

10.2.1. Serious Injury Management

If a serious injury occurs (Level 3 or above Incident causing Serious Injury) the injured person(s) must be provided with appropriate First Aid and then medical treatment and support in addition to complying with the legal responsibilities of site management (See 10.4.3 Management of Notifiable Events). The basic steps below may assist:

- Make sure the situation/area is safe (e.g., turn off power tool, get people away from ledge and put a barrier up etc.). Do not do more than make safe. Do not be tempted to tidy up/repair etc.
- Provide First Aid and summon medical assistance (i.e., call 111 or if practicable, ensure the injured person is escorted to an appropriate medical facility by an appropriate person, i.e. First Aider or Manager).
- While awaiting assistance, shield injured people from onlookers to protect their privacy and dignity.
- Ensure others are looked after by either given something productive to do (e.g., liaise with emergency services, fetch/carry first aid supplies, directing other workers, calling FRL and Land Development manager etc.) or taken/instructed to go to a place of safety (e.g., Smoko area).

Once the situation is under control and the injured person is under the appropriate care of a medical professional the scene must be managed in accordance with 5.5 Management of Notifiable Events.

10.3. Accident, Incident & Concern Reporting Procedure

All incidents must be reported within 24hrs or as soon as practicable. All workers are required to report all incidents to their line manager (employees) or an FRL representative as soon as they occur or as soon as practicable. Initial reporting may be verbal or text depending on the actual or potential severity.

When reporting the incident, the potential severity must be considered, particularly when the severity of the incident had the potential to be greater than the actual injury or loss (e.g., the actual injury is a cut hand although the event had the potential to amputate the hand).

Upon notification personnel are required to report as per 10.1.8 The Incident Management Matrix according to their actual and potential severity. Reporting includes reporting to the FRL and FB management team and then recording in the electronic incident database ('Radar').

10.4. Reporting Worksafe Notifiable Events

Worksafe NZ must be notified when certain work-related events (Notifiable Events) occur. FRL will ensure that Worksafe NZ is notified as soon as possible after becoming aware that a notifiable Event arising out of the conduct of the business or undertaking has occurred. Notification may be by FRL or by a PCBU depending on the particular circumstances of the event. Where a PCBU notifies, FRL must receive a copy of the notification as soon as practicable.

Upon notification, Worksafe NZ may immediately investigate or follow up on notifiable events, i.e., events that cause death, serious injury/illness or have the potential to cause death or serious injury/illness (serious health and safety risks). A Notifiable Event is any of the following events that arise from work:

- A Death
- A Notifiable Illness or Injury
- A Notifiable Incident

Only serious events are intended to be notified. These trigger requirements to preserve the site, notify Worksafe and keep records. In the event of a Notifiable Event occurring, FRL employees are required to follow normal reporting processes to FRL in the first instance. Assistance can then be provided immediately to report to Worksafe NZ and provide direction as to the management of the scene (e.g., securing the scene).

10.4.1. Notifiable Illness/Injury

A Notifiable Illness or Injury is an injury classed as serious in nature and is comparable to a 'Serious Injury/Level 3' as defined by FB. The full list is detailed in Attachment 16.5 and also found on Worksafe NZ's website: What events need to be notified? | WorkSafe.

10.4.2. Notifiable Incidents

A notifiable incident is an unplanned or uncontrolled incident in relation to a workplace that exposes the health and safety of workers or others to a serious risk arising from immediate or imminent exposure to a serious event. The full list is detailed in Attachment 16.6 and also found on Worksafe NZ's website: What events need to be notified? | WorkSafe.

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10.4.3. Management of Notifiable Events

When a Notifiable Event occurs the person, who manages the site must take all reasonable steps to ensure the site is not disturbed until authorisation is received by a Worksafe Inspector. This may include placing an exclusion zone around the area and preventing entry. This applies only to the immediate and/or affected areas and may not apply to the whole site. FRL management and EHS Team will provide immediate support upon becoming aware of a Notifiable Event.

The scene must remain undisturbed until release by a Worksafe Inspector except to:

- Help an injured person (s)
- Remove a deceased person(s)
- It is essential to make the site safe or to minimise the risks of a further notifiable incident.
- By or under direction of a police officer
- Permitted by the regulator or an Inspector.

Worksafe NZ must be notified by the fastest possible means given the circumstances. This may be via the Worksafe NZ Website (www.worksafe.govt.nz) or by telephone (0800 030 040). Once notified, Worksafe will provide acknowledgement that the notification has been received.

Worksafe will consider the notification and provide advice as to the next steps.

10.5. Incident Investigation

All incidents are to be appropriately investigated. The aim of the investigation is to identify and eliminate the root causes of the event and prevent reoccurrence. Where the incident is classified as a Level 3 (actual) or Level 4 (potential) the investigation must be suitably documented. The objectives of the investigation include:

- Establish the facts
- Identifying contributing factors and latent (underlying or unidentified) hazards
- Review the adequacy of existing controls and procedures
- Report the findings
- Recommend corrective actions which can reduce the risk and prevent reoccurrence
- Detect organisational factors that can be analysed to identify specific or reoccurring problems
- Identify key learnings for sharing
- Not to apportion blame or liability

Where the incident has involved a PCBU, the PCBU may conduct the investigation however, the PCBU is required to provide a copy to FRL. FRL may conduct a supplementary investigation where appropriate (i.e., where elements controlled or managed by FRL may have contributed to the incident or where the PCBU requires FRL assistance).

Investigation techniques and reports use the 5-why approach (for up to Level 3 potential or ICAM (Incident Cause Analysis Method) for Level 3 incidents or Level 4 potential.

10.5.1. Investigation outcomes

The investigation may identify hazards which have not previously been identified, have been under assessed for risk and/or the controls have not been sufficient.

All incident investigation findings and outcomes are considered by the FRL EHS Leadership Group and the Health and Safety Committee. In these meetings the FRL Risk Register is also considered and reviewed including any changes due to incidents.

It is a requirement that PCBUs involved, also implement any corrective actions and incorporate changes to their EHS management system.

10.5.2. Corrective & Preventative Actions

The incident investigation may identify causal factors to the event or associated factors (failings which did not contribute to the incident but became apparent during the investigation) which require corrective actions to rectify and prevent occurrence.

Where corrective actions are identified, they must be:

- Discussed with the relevant workers (i.e., those directly involved, e.g., injured person).
- Discussed and agreed with the Branch (or equivalent) Manager or suitable delegate.
- Recorded with the incident in the electronic incident management database (by FRL).
- Allocated to a suitable person to complete.
- Allocated a suitable timeframe for completion.
- Communicated by FRL to other departments where applicable (e.g., Other Departments within FRL or FB Business Units).
- Tracked to completion and closed.

10.6. Incident Data Analysis

All incidents reporting into the electronic reporting system are collated monthly and annually and reviewed to identify areas of improvement for specific incidents and trends.

The FRL EHS Plan is reviewed annually and is developed through a review process which includes consideration of incidents and trends identified from the previous/current year. For trends identified through monthly reviews, initiatives may be developed through the FRL EHS Leadership Group and/or the FRL Health and Safety Committee for injury prevention and/or improved health and safety outcomes.

10.7. Injury Prevention

Where applicable and practicable FRL will consider implementing proactive injury prevention activities based on specific workplace hazard and/or risk factors in addition to trend analysis. Examples of this may include providing specialist equipment for those with pre-existing conditions to prevent injury or further injury or where an identified risk has identified the requirement to implement controls for injury prevention.

11.0 Health & Safety Consultative Process

Worker participation is essential for health and safety at work. Worker representatives are one way for workers to participate in improving workplace health and safety and can provide a voice for workers who might not otherwise speak up.

FRL have an agreed worker participation system which facilitates the development, monitoring and review of workplace health and safety. This process is through site Worker Engagement meetings which meets at least quarterly.

11.1. Worker Engagement Meeting Purpose

The Worker Engagement Meeting fulfils the requirement of the Health and Safety at Work Act which require worker consultation on matters relating to health and safety. It is also good safety management practice to involve workers in the decisions which affect their health and safety.

It is also an opportunity for workers to provide feedback on health and safety and suggest improvements for FRL, or other PCBUs to consider.

11.2. Worker Engagement Meeting Members

The Worker Engagement Meeting Members comprise of the relevant FRL Branch Manager or suitable delegate (e.g. the Construction Manager/Assistant Construction Manager/Project Manager), an EHS team member and worker representatives from a variety of PCBU Companies or Trades.

Workers who wish to be on the committee may volunteer. Where they are supported by their manager and there are spaces they are welcomed. Workers do not have to hold a Safety Representative qualification, but it is recommended that those who wish to serve for a period of at least 12 months receive training by their employer.

11.3. Worker Representatives

Worker Representatives assist both their fellow workers and FRL by:

- Representing their work group or individuals in the meeting.
- Making health and safety recommendations.
- Providing feedback to FRL on health and safety compliance.
- Assisting to identify and manage risks to health and safety.
- Providing a worker perspective due to their day-to-day work activities.

11.4. Consultation

PCBUs are requested to provide a Worker Representative during on-boarding, although this is not a compulsory requirement.

Workers are informed of the presence of the Worker Engagement Meetings upon Induction.

The Worker Engagement Meetings may or may not be recorded but where minutes are taken, they are made available to all workers. This may be by providing individuals a copy upon request or being made available in the site office.

12.0 Emergency Procedures

FRL require every site to have an emergency procedure which identifies realistic potential emergency situations and provides a documented response for workers on site.

On sites, the emergency response procedure is documented and forms part of the Site-Specific Safety Plan. Emergency procedures consider:

- The potential emergency situations that could occur.
- The location of the work being undertaken.
- The tasks being undertaken.
- The location and availability of relevant emergency services.

The emergency procedures apply to all FRL employees, workers and visitors to the site and each person is inducted on the requirements prior to being permitted entry. In the case of visitors who will be accompanied at all times, their induction include informing them of the requirement to follow the lead of their representative and adhere to specific relevant instructions.

All employees, workers or visitors who will work unsupervised or unaccompanied will be provided with an induction on the specific procedures for the site.

12.1. FRL Emergency Procedures

FRL emergency plans include the requirements for all foreseeable emergencies for the site and or where applicable, specific activities that are controlled by FRL or may affect the whole site and/or multiple PCBU companies or other groups of people.

This plan is kept in the site office (or similar) and is available upon induction to all workers/visitors upon induction and at any time throughout the work.

Notices specifying emergency contacts are posted (may be on site hazard boards or similar) throughout the site.

The emergency plan will include at least one suitable designated Assembly Point where all workers affected will be required to assemble in the event of an emergency or a drill.

12.2. Crisis Management

A Crisis is a major incident/situation which has the capacity to escalate and negatively impact the reputation of FRL or FB. Examples of include but are not limited to:

- A serious injury or fatality
- A significant Environmental Spill
- A major Fire or Explosion

All incidents must be reported as per Section 10 Incident and Injury reporting, recording & investigation. Where an actual or potential Crisis is identified the FRL Site Representative will refer to the FB Group Crisis Management Pack.

12.3. PCBUs Emergency Procedures

All PCBUs are required to complete a SHEP or similar prior to working with FRL.

As part of the SHEP PCBUs are required to develop appropriate emergency procedures which apply to their scope of work e.g., task or environment. Where applicable this is in addition to the FRL

Emergency Plan and may include how the PCBU will manage specific emergencies. Examples include but are not limited to:

- Work at height (prevention of fall and rescue)
- Confined Space rescue
- Working alone (assess to assistance)
- Hot work (prevention of and management of fire)

The PCBU is responsible for ensuring that the emergency plan is documented, approved by FRL and communicated to all affected persons (affected persons may be workers, including to other PCBUs or visitors to the site) prior to the work commencing. Communication may be through meetings e.g., a Pre-Start, Toolbox, Induction and/or signage where appropriate.

The emergency plan may incorporate aspects of FRLs emergency plan (e.g., use of the Assembly points).

12.4. Roles and Responsibilities

On FRL sites it is the responsibility of the project/ site manager to ensure that there is sufficient emergency situation cover available on site. In addition to this the project/ site manager is responsible for managing any emergency situations including drills.

Names and contact details of Emergency Contacts (site manager) and First Aid personnel are posted on the Hazard boards on the site.

12.5. Emergency Drills

Emergency Evacuation Drills must be conducted at intervals of not more than 6 months on each site. This considers the shifts (where applicable), the worksites and the workers.

In addition to the Emergency Evacuation Drills, FRL may test for specific scenarios with a high likelihood of occurring.

Where necessary, FRL shall engage specialists in the field of emergency procedures (or the scenario to be tested) to assist in the development and testing of emergency procedures.

12.6. Post Emergency Response Review

Where an emergency response situation has occurred (or a drill) the response is reviewed to confirm that the response was adequate. Where areas of improvement are identified, this is documented in the review and tabled at the EHS Leadership Group and/or the Health and Safety Committee.

Where changes to procedures are required, this is actioned through consultation with the Health and Safety Committee.

12.7. First Aid

The number and availability of First Aid personnel and emergency equipment is assessed and documented on the site Emergency Plan. All FRL project/ site managers are trained in First Aid.

In addition to the project/ site managers, PCBUs are required to assess their own emergency requirements including First Aid and document this on their own emergency plan, SHEP or other suitable document.

12.8. Emergency Equipment

On Sites FRL provide and maintain basic emergency equipment including Fire Extinguishers, First Aid and Spill Response Equipment.

All emergency equipment on site including (e.g., Fire Extinguishers, First Aid supplies) must be checked periodically and serviced/replaced where required.

Fire Extinguishers supplied by FRL are serviced through the Branch through a service provider. First Aid equipment and Spill Response provided by FRL is replenished as required by the project/ site manager.

It is the responsibility of the PCBUs to service, replenish or replace any Fire Extinguishers, First Aid, Spill Response, or other emergency equipment supplied by them.

13.0 Environmental and Waste Management

13.1. Environmental Protection

Everyone has a duty to prevent pollution and protect the environment. This is a legal requirement under the Resource Management Act 1991 (RMA). The main requirements of the Act which are applicable include:

- Restrictions on the use of land
- Restrictions relating to water
- Discharges of contaminants into environment
- Duty to avoid unreasonable noise
- Duty to avoid, remedy, or mitigate adverse effects

FRL require all PCBUs and workers to follow good environmental management principles and to ensure protection of the environment during the course of their work. This includes but is not limited to:

- Dust control (e.g., on-tool dust extraction, covering spoil heaps, dampening down of site using water).
- Run-off/silt control (e.g., collect run-off away from storm drains and prevent run-off from entering the drain).
- Vacuum dust/slurry and dispose of correctly.
- Wash equipment away in designated wash stations (or where permissible, over unsealed areas away from storm drains or trees).

The RMA is designed to protect the environment and it is illegal for any substance to be discharged into natural water, the storm water, land or air unless authorised by a resource consent or a district or regional plan. Polluters can be fined, issued abatement notices and/or prosecuted.

For further information in relation to environmental responsibilities, the Regional Councils (Auckland and Christchurch) have a variety of information on their websites to assist.

- https://www.aucklandcouncil.govt.nz/environment/Pages/default.aspx
- https://cccgovtnz.cwp.govt.nz/environment

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14.0 Managing PCBUs & Subcontractors

14.1. Selection and Approval

To ensure that PCBUs working for FRL have the required skills and experience to carry out their work in a safe manner, and in compliance with all statutory, industry and the company requirements, they are required to provide information on the operational and safety management systems and procedures to be used during the contract work. This information must be provided by the PCBU, and approved by FRL before starting work.

The minimum requirement for all PCBUs is an Independent Contractor Agreement and a Safety Plan which will be a Safety Health and Environment Plan (SHEP) or suitable equivalent.

The SHEP details the work the PCBU is required to complete and addresses how the PCBU will manage the Safety, Health and Environmental aspects of the work to reduce risk to as low as reasonably practicable.

The SHEP requests information on:

- Site/Contact Information
- Subcontractor Management
- Risk Assessment and Control
- High Risk Work
- Risk Register
- Hazardous Substances
- Training, Competency and Supervision
- Worker Engagement and Participation
- Emergency Procedures
- Reporting
- Acknowledgement of responsibilities

FRL assess the contents of the SHEP (or equivalent) and determine the suitability of the PCBU based on the risk they present to FRL. A SSSP/SHEP Approval Checklist may be used to assist in this process.

Once FRL is satisfied that the PCBU has documented their Health, Safety and Environmental management plan for the site sufficiently, the SHEP or equivalent plan is approved.

Once approved or during the approval process FRL will provide the PCBU with a copy of FRL's Site EHS Manual which contains sufficient EHS information relevant to the PCBUs. It is an expectation that the PCBU ensure their workers are familiar with the contents and have access to a copy or are provided with a copy. Copies are available through FRL including a hard copy in the Site Office for workers.

14.2. Subcontractors

Where workers to site are Subcontractors of FRLs PCBUs they are required to adhere to the requirements of the PCBU who has engaged them and FRL while on site.

As part of the PCBU on-boarding process, the PCBU is required to declare whether they are to engage Subcontractors to work on the FRL site.

Where Subcontractors are to be engaged (including for delivery to site only) the PCBU is required to detail how they will:

- Evaluate and Approve EHS for Subcontractors
- Verify their standard of EHS management
- Ensure Subcontractor workers are inducted into their requirements and that of FRL
- Ensure that Subcontractor workers are suitably trained, competent or are adequately supervised.
- Monitor their EHS Performance.

In addition to this the PCBU is required to document what EHS documents they require their Subcontractor to maintain to assist them to manage their EHS. This may include their own Site-Specific Safety Plan or specific task analysis documentation such as a JSEA or TA, for example.

14.3. PCBU/Subcontractor (Worker) Induction

All Contractors and Subcontractors are required to complete the VR online induction using the link/ QR code provided to the contracting company before arrival on site. This is intended to introduce the worker to FRLs Life Saving Rules as well as other generic FRL requirements.

A site -specific induction will be provided on site prior to commencing work. This Induction is be provided by an FRL Representative (e.g., project/ site manager).

The Induction includes:

- The Health, Safety and Environmental risks applicable to the site.
- The Controls applicable to the risks (FRL minimum requirements).
- Risks the Contractor will introduce to the site and the controls required.
- Confirmation of training and/or competency records.
- General FRL Health, Safety and Environment requirements.
- Emergency Procedures.
- Drug and Alcohol Policy.
- Reporting requirements.

The only exception to a Contractor receiving a full induction is in the case of short duration emergency work. In this case the FRL representative may authorise work to assist for the purposes of making safe or prevent worsening of a situation. In this case the FRL representative must provide sufficient verbal information in relation to the hazards, risks, and controls on site in addition to, where practicable and safe, accompanying the Contractor and providing direction and/or assistance.

14.4. Monitoring of PCBU EHS Performance

Monitoring of PCBUs is undertaken immediately from commencement of work. This is through conducting Critical Control Verifications, Risk Containment Sweeps, site walks and observations.

These are conducted as part of FRL workers personal Key Performance Indicators, and this may be on the site they manage or on a site managed by another project manager. Typically, each site is inspected at least monthly. PCBUs on the site at the time of Inspection may be included and are selected at random.

In addition to Site Inspections by FRL Supervisors and Managers, PCBUs are monitored during EHS Quarterly Audits which are conducted by the EHS Team.

This audit focusses on a selection of PCBUs who are present on site during the audit and are selected at random or are included due to a particular task they are conducting.

At least annually, all PCBUs who are considered high risk (i.e., undertaking tasks with high potential as specified on their SHEP or Site-Specific Safety Plan) are formally assessed for their EHS performance. This takes into account:

- The contents of their SHEP or equivalent documentation.
- The observations made in audits and inspections.
- Any recognition nominations or awards made.
- Injuries or incidents reported including subsequent investigations.
- Near miss or hazards reported.
- Prosecutions or infringements.

The performance assessment is documented on a PCBU Performance Review document or suitable format.

15.0 Monitoring of EHS on Site

15.1. Overview

All FRL Sites must be regularly inspected and/or audited to ensure that safe work standards are being adhered to and that risk controls are being effectively applied. This may include inspections by the PCBU, FRL or a third party engaged by FRL (e.g., Site Safe). Where any inspection/audit identifies an unsafe condition or unsafe behaviour, corrective action must be taken to remedy the deficiency.

15.2. Project/ Site Manager Inspections

FRL project/ site managers are required to conduct periodic formal inspections of sites during the Land Development and Construction phase. This may be on the site they manage and/or another FRL site managed by a different site manager (e.g., Peer audit).

The frequency and sites to be inspected are variable and depend on the particular project/ site managers personal performance targets but it is expected that each site is inspected monthly and at least quarterly.

Inspections are conducted by either walking around the site observing the workplace and engaging with workers (RC Sweeps, Walks) or completing and inspection checklist (CCV).

Issues identified during the inspection must be rectified as soon as practicable. In most cases it is practicable to rectify the deficiency at the time of audit (i.e., immediately). For high-risk situations, it may be necessary to halt the activity until suitable controls are in place.

15.3. EHS Audits

In addition to project/ site manager inspections, the EHS team conduct periodic audits during the Land Development and Construction phase of the site. These audits are commenced early in the Land Development and Construction phase (approximately 4-6 weeks) and continue quarterly where practicable (i.e., they are scheduled quarterly but due to schedules, this may be altered to suit).

15.4. Leader Walks

Leader Walks are conducted by all member of the senior leader team, project managers, quantity surveyors, sales consultants and EHS team members on sites. These consist of selecting a particular task or subject depending on the circumstances and engaging with a worker, or a group of workers, on site.

Leader walks are intended to be a systematic & interactive process that provides feedback to workers on both safe (positive reinforcement) and unsafe behaviours (corrections) observed in the workplace.

Delivery of such interactions is to be non-confrontational with an intent for learning to create a safer working environment.

15.5. PCBU Inspections

PCBUs are required to monitor their own EHS activities and workers including the work of their Subcontractors where applicable. This is to ensure that all workers are working according to the safe systems of work required and the specific requirements of their management, the PCBU (if a Subcontractor) and FRL. During on-boarding, PCBUs are required to specify how this is achieved and are required to adhere to the agreed process during their engagement. Where the monitoring is formal (i.e., documented), a copy must be provided to FRL as soon as practicable.

Acknowledgment of Receipt of the FRL Site EHS Manual:

I acknowledge having received a copy of this FRL Site EHS Manual and having been provided with sufficient opportunity to discuss its contents, ask questions, and clarify understanding with the FRL Representative.

I further agree and acknowledge to abide by the provisions of this Site EHS Manual (including subsequent amendments and additions) while engaged to work on FRL sites.

I understand that where I employ workers (including Subcontractor workers) it is my responsibility to ensure that they are familiar with the contents of this manual, have access to a copy and adhere to the requirements while on FRL sites.

Company Name: _____

Print Name: _____

Signature: _____

Date: _____

FRL Representative _____

Print Name: _____

Signature: _____