

PIVOT TREE

Health, Safety and Environment Guideline Management Document

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1 INTRODUCTION

1.1 PURPOSE AND SCOPE

Pivotree Pty Ltd (**Pivotree**) is committed to Health, Safety and Environmental management. Senior management and employees of Pivotree have adopted an approach to HSE management in order to provide and maintain a safe and healthy working environment, while ensuring that the business objectives are achieved efficiently and with a minimum risk to personnel.

1.2 LEADERSHIP AND COMMITMENT

It is the responsibility of the Pivotree Directors to ensure that the organisation is appropriately funded and resourced to discharge the obligations set out in our policies and procedures, and the legislated requirements of a safe workplace.

The Pivotree Directors are committed to the safe execution of work and of zero harm to all personnel and subcontractors executing work for us.

1.3 REFERENCES

1.3.1 CODES AND STANDARDS

Ref	Document	Doc. Number
[Ref 1]	Western Australian Government Work Health and Safety Act 2020	

1.3.2 PIVOTREE DOCUMENTS AND FORMS

Ref	Document	Doc. Number
[Ref 2]	Health, Safety, and Environment Policy	COR-POL-00005.0
[Ref 3]	Fitness for Work Policy	COR-POL-00006.0
[Ref 4]	Recruitment Inclusivity & Diversity Policy	COR-POL-00007.0
[Ref 5]	Anti-Bribery and Anti-Corruption Policy	COR-POL-00004.0
[Ref 6]	Code of Conduct	COR-PHI-00104.0
[Ref 7]	Board Charter	COR-PHI-00105.0
[Ref 8]	Corporate Governance Statement	COR-PHI-00106.0

1.4 ACRONYMS AND ABBREVIATIONS

Acronym	Definition
ALARP	As Low as Reasonably Practical
HSE	Health, Safety and Environment
VOC	Verification of Competency

2 OCCUPATIONAL HEALTH AND SAFETY OBJECTIVES

2.1 HSE POLICY STATEMENTS

The Health, Safety and Environmental Policies and Drug and Alcohol Policies of Pivotree will be adhered to for personnel onboard under contract to Pivotree.

2.2 OBJECTIVES AND TARGETS

2.2.1 OVERARCHING OBJECTIVES

Pivotree's overarching objective in any project work is zero harm to the health and safety of all personnel and to the environment. To achieve our zero-harm target, Pivotree adopts the following general strategies:

1. Appropriate identification, assessment, and management of HSE risks,
2. Effective implementation of safe systems to work and training in such systems for personnel and subcontractors,
3. Management and oversight of personnel and subcontractor activities; and,
4. Prompt reporting and investigation of any HSE incidents.

Objectives are to be established for all relevant functions at all operational levels and shall be measurable. All objectives and plans to achieve the objectives are to be recorded and controlled.

2.2.2 PROJECT OBJECTIVES

Specific project objectives and performance targets are set for each project in consultation with the client prior to each project. These targets shall assist both Pivotree and clients to achieve their company objectives.

Typical project HSE objectives are:

- To carry out all works to achieve the highest standards in HSE management and a target of zero incidents.
- To report all hazards, incidents, and injuries in accordance with relevant Statutory, Pivotree, and Contractor's procedural requirements, including the reporting of all injury, damage (including pollution or spills), occupational illness, or near-miss incident as soon as practical after the event.
- To promptly carry out remedial action for all identified hazards to reduce the risk of injury to personnel, damage to equipment and the environment. All Pivotree personnel will comply with Pivotree's Hazard Identification and Risk Assessment Process.
- To employ risk management strategies that identify, assess, and reduce all HSE risks to ALARP.
- To participate and cooperate, if required, in any investigation resulting from incidents or injuries to ensure causal factors are identified and appropriate corrective actions are implemented to mitigate risks and prevent recurrence.
- To be responsible for our own people's safety and prevent unsafe behaviour or infringements against statutory health, safety, and environmental management.
- To ensure that Pivotree personnel use equipment provided which is fit for purpose and with all safety features in place in accordance with statutory health, safety, or environmental rules.
- To ensure that all Pivotree personnel are competent to carry out their work, understand work procedures relevant to their activities, have knowledge and working experience of the equipment that they will be expected to use as part of their duties, including all the safety features, to minimise the associated hazards.
- To ensure that all Pivotree personnel are not, at any time, under the influence of alcohol or illegal drugs/controlled substances, and that drugs prescribed specifically for a medical condition will be brought to the attention of the medical staff onsite.
- To ensure that all Pivotree personnel follow correct procedures for the management of all chemicals and hazardous substances.
- To ensure that all Pivotree personnel are aware that they as individuals have the responsibility to inform their supervisor if suffering from fatigue or illness.
- To ensure that all Pivotree personnel dispose of waste in the prescribed manner and report all instances of spillage to the appropriate supervisor



2.2.3 TARGETS

KPI	Metric	Monitoring Mechanism	Target
Lead Indicators			
Risk Assessments	Risk Workshops	Risk Report Signoff	Risk Report accepted by Project Leads within 1 month.
Action tracking	Action Closeout	Action tracking register	All actions closed out prior to execution phase.
Training	Required Certification for Role	Training Matrix	100% of training completed
Audits	Number of Audit	Audit schedule	100% of audits completed vs. planned audits
Lag Indicators			
Lost Time Injury Rate (LTIR)	LTIs per 10 ⁶ hours	Incident Reports	Zero days away from work for the duration of the project
Medical Treatment Injury Rate (MTIR)	MTIs per 10 ⁶ hours	Incident Reports	Zero medical treatment injuries for the duration of the project
Total Recordable Injury Rate (TRIFR)	TRIFR per 10 ⁶ hours	Incident Reports	Zero recordable injuries for the duration of the project
Restricted Work Injury Rate (RWIR)	RWIR per 10 ⁶ hours	Incident Reports	Zero restricted work injuries for the duration of the project
Motor Vehicle Crash Rate (MVCR)	MVCR per 10 ⁶ hours	Incident Reports	Zero motor vehicle crashes
Near Misses	Incident	Incident Reports	Zero Near Misses
Plant/Property Damage	Incident	Incident Reports	Zero property and plant damage for the duration of the project
Regulatory Notices Issued	Incident	Improvement / Prohibition Notices	Zero Improvement / Prohibition notices for the duration of the project

3 TRAINING AND COMPETENCE ASSESSMENT

HSEQ training, competence and awareness is a requirement of all contractors and employees of Pivotree to ensure they can perform the work in a safe and responsible manner. This is in addition to being able to understand any international standards, regulatory body requirements, policies, procedures, targets, and objectives.

All key personnel are to have experience and recognised qualifications as appropriate to their assigned duties. Pivotree Directors are responsible for ensuring that all personnel either already possess the correct qualifications or are given access to training that enables them to achieve the qualification. If a gap in an employee's competency is noted, then the employee can request training. The additional training may be provided by external parties or the result of inhouse training sessions. All copies of training records and qualifications are to be retained.

All personnel will, prior to employment be vetted by a Pivotree director and shall be competent and qualified to conduct the tasks that will be assigned to them. Where appropriate and able, personnel will hold qualification of competency that have been issued through recognised bodies with appropriate certification or will have extensive experience in their field of expertise.

Pivotree requires that subcontractors working on its behalf can demonstrate that their employees have the required competence and / or appropriate training.

Where required by the project, a training matrix with all personnel will be commissioned and maintained with appropriate evidence in backup.

3.1 EMPLOYEE DEVELOPMENT

All personnel employed by Pivotree will be encouraged to undertake and record professional development activities. The objectives of these activities will encompass:

- Development of technical knowledge and skills in employees' current field.
- Broadening of technical knowledge and skills into fields parallel to employees own, thus enabling them to move into another job should the need or opportunity arise.
- Acquisition of non-technical knowledge and skills, e.g., Management techniques, Communication and presentational skills, Law (Health & Safety, Environmental, Employment), Finance, Languages, thus preparing employees to assume wider or greater responsibilities when the opportunities arise.

Pivotree will support staff undertaking continuous professional development by offering time off to attend events, such as lectures, seminars and conferences that are relevant to the business objectives of the organisation. Staff attending events will be required to share their learning with other staff by inputting at weekly team meetings and and/or circulating written summaries of the event.

Pivotree will consider, where relevant to the objectives of the business, requests for financial support for study, purchase of study text and time off to sit examinations.

3.2 PROCESS

In the first instance staff should discuss training and development needs with their line manager.

During this discussion the objectives and goals of the training or professional development will be identified. The line manager will determine how these objectives align with Pivotree's strategic plan and the needs of the individual

A training and development request form to be completed and submitted for authorisation. If the training request is denied the individual should be notified and told why.

On completion of training the employee's line manager is to be informed of:

- Date of training, Duration, and Provider
- Title of training
- Copies of any certification to be submitted to Human Resources
- Details of training undertaken will be recorded on the Human Resource database and copies of certification kept electronically and paper based
- If appropriate the learning should be shared with other staff



3.3 VERIFICATION OF COMPETENCY

For all personnel conducting High Risk Work License activities a VOC will be conducted at appropriate intervals to ensure the personnel are up to date with new industry regulations, workplace safety standards and any new technology or policies related to the industry and job role. Records of the VOC's will be stored both electronically and physically.

4 PERFORMANCE EVALUATION

4.1 MONITORING AND MEASUREMENT

The effective monitoring of the HSE management system is undertaken through the following mechanisms but is not limited to:

- Internal HSE Audits: to be conducted systematically by senior management and the HSE department in accordance with the Internal Audit Schedule. The audits will be carried out to verify compliance with the HSE Policy and HSE management system documentation, while ensuring that supplementary Client requirements are also being met.
- Operational HSE Performance: it is the responsibility of senior managers to monitor and report HSE performance while based on site. Accident and Near Miss (Hit) Incidents, assessment visits and accident or incident investigations. The reports will be forwarded to the HSE Manager for review and follow-up action where necessary. Agreed improvement actions shall be completed in a timely manner following review.

4.2 PERFORMANCE CRITERIA

The metrics recorded in Section 2.2.3 are captured and maintained on a project-by-project basis. The results are tabulated, and performance reported to the Directors of Pivotree on an annual basis or when required.

In the event of an incident, all details shall be recorded to support incident investigation and root cause analysis.

4.3 PERFORMANCE SCHEDULE

The metrics referred to in Section 2.2.3 have different reporting periods. The review, tabulation, and reporting of OH&S metrics is conducted annually.

4.4 RESULT COMMUNICATION

Incident reporting occurs immediately to the Pivotree Directors and then in accordance with statutory requirements to the appropriate regulators.

OH&S Performance is reported to Pivotree personnel and subcontractors at an annual meeting.



5 AWARENESS AND COMMUNICATION

5.1 WORKFORCE EMPOWERMENT AND INVOLVEMENT

Pivotree utilises various methods of communication to consult with and manage its workforce with respect to HSE matters. The method, frequency, formality, and channel for OH&S communication, reporting and capture of metrics changes depending on the needs of the project, but in general, Safety Meetings occur face to face at least monthly when a project is in execution and is a common forum where such matters can be communicated.

Personnel employed by Pivotree are made aware that they have the right to stop work when they consider an operation unsafe and in stopping the work, they do so without fear of recrimination. The implications and potential consequences of not following the Pivotree OH&S/HSE management systems is also communicated when employment commences and again at project kick-off.

5.2 INTERNAL COMMUNICATIONS

All communication, correspondence and requests for information related to Health and Safety documentation shall be issued by the Managing Director.

HSE notices and bulletins are the main form of HSE information dissemination to all Pivotree employees at various levels along with direct email communication. Pivotree employees are encouraged to contribute relevant information to the Health and Safety department where they believe HSE improvements can be made. Any such improvements or suggestions are then addressed at the Pivotree management meetings, and any outcomes communicated to the relevant personnel. Employees are then made aware of their contribution to the effectiveness and changes made within the HSE management system including the benefits of an improved HSE performance.

When corresponding internally the communication needs to take into consideration additional aspects such as language, culture, and disability to ensure that the message is understood.

5.3 EXTERNAL COMMUNICATIONS

The Pivotree Managing Director is responsible for all correspondence with enforcing authorities, local communities, customers, suppliers and other external bodies in relation to HSE communications. Once the external communication is received the Managing Director will assess whether an action is required, if none then the communication will be closed and stored as a record. If remedial action is required a Corrective Action will be raised and the results will be communicated, and action taken as appropriate.

When corresponding to external parties the communication needs to take into consideration additional aspects such as language, culture, and disability to ensure that the message is understood.

6 EMERGENCY PREPAREDNESS AND RESPONSE

6.1 OFFICE EMERGENCY PREPAREDNESS AND RESPONSE

Emergencies situations are those which imminently seriously threaten the life or wellbeing of people. Potential causes of emergencies in the office have been identified as fire, and medical emergencies.

Safeguards assisting in the event on an emergency:

- Fire plan and emergency evacuation diagram (where required)
- First aid training
- Communication and training in emergency response roles
- Awareness and drills (where appropriate)
- Project emergency preparedness and response

6.2 FIRE DRILLS

Where Pivotree is managing a project location, a minimum of two fire drills per year will be conducted. Pivotree Personnel are expected to be familiar with and participate in the Emergency Response Procedures for the sites that they visit. The procedure for the drills will be as follows and at the completion of the drill the response will be evaluated:

5. No warning will be given.
6. A member of the building management team will activate the alarm.
7. The bell will ring continuously.
8. All staff must leave the building as per the specific building evacuation plan.
9. The Pivotree person in charge will check all employees are out of the building and notify the building management fire warden that all personnel are accounted for.
10. Once the building management fire warden is satisfied the building is clear personnel can re-enter the building.
11. All personnel are responsible for the safe evacuation of visitors and contractors.

6.3 ALARM TESTING

The alarms at Pivotree managed locations will be tested once a month. The procedure for the testing is below:

- Building management will announce that the fire alarms are about to be tested and that no action is required.
- Building management will then activate the alarm.
- The alarm will then be cancelled and reset by Building management.

The testing of alarms will occur on different days and at various times so all employees, including those who work part time will be made aware of what the alarm sounds like.

6.4 EVACUATION IN CASE OF FIRE

The initial duties of anyone discovering a fire will be to:

- Sound the alarm
- Tackle the outbreak (if possible and trained to do so) with the appliances available without taking personal risk.

Upon hearing the fire alarm at a Pivotree managed office:

- It will be the responsibility of the Managing Director or designated responsible to call the Fire Department on 000.
- Stop work and where possible turn off the power to any machines.
- Immediately exit the building by the evacuation route and assembly at the designated assembly area closing all doors on the way.
- Do not wait to collect personal belongings.
- The nominated Fire Warden for the office will supervise the evacuation of personnel to the assembly location.
- On arrival at the assembly point the person in charge will check to ensure all Pivotree persons including visitors and contractors are accounted for.
- Immediately on arrive the officer in charge of the Fire Department team must be notified whether all staff are safety evacuated, or of their last known position.

The evacuation route and places of assembly are clearly defined and marked within each office and staff and visitors are made aware of the location during the inductions.

6.5 FIRST AID

The Pivotree Managing Director or nominated individual is to ensure that the contents and materials within the First Aid Boxes at Pivotree managed locations meet the statutory regulations. The contents of all First Aid Boxes are regularly checked and replenished where required.

A noticed highlighting the names and contact details of all qualified First Aid Officers is to be displayed next to the First Aid Box and included within the employee induction.

At the scene of a serious incident or medical emergency, whenever possible it is to be left undisturbed until the Investigating Authority, Managing Director or equivalent has had the opportunity to inspect and investigate. First Aid can be provided as a precaution until proper medical treatment is available.

6.6 SAFETY INDUCTION

Safety Inductions are completed with all new employees, long term contractors or temporary workers as soon as possible once the work has commenced. The Administration function will be notified in advance of any new employee and the potential start date. It is the responsibility of the Administration representative to then liaise with the employee directly or to the relevant supervisor to set a time for a safety induction to take place.

The Safety Induction covers:

- Fire and Emergency Procedures (including the responsibilities and duties of individual employees during an emergency)
- Western Australian Government Work Health and Safety Act 2020 [Ref 1]
- First Aid equipment location
- Health, Safety, and Environment Policy, Fitness for Work Policy, Recruitment Inclusivity & Diversity Policy, Anti-Bribery and Anti-Corruption Policy, Code of Conduct, Board Charter, and Corporate Governance Statement. [Ref 2-8].

6.7 VISITORS

All Visitors to a Pivotree managed location are to report to administration. Once the visitor is in the building it is the responsibility of the person that they are visiting (particularly in an emergency). Visitors to the office who are there to conduct repair works or maintenance are to be met by the Pivotree representative who will escort them to the job location. These visitors will be made aware of the safety rules and evacuation procedures.

6.8 EMERGENCY RESPONSE REVIEW

The Emergency Response procedure is to be reviewed at a minimum annually or as required due to changes in guidelines. Any revision made it to be communicated to all employees.