



WORKPLACE HEALTH & SAFETY MANAGEMENT PLAN

Document Number: AGA-PLA-HSE-001

Revision: 11

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Table 2 – Document Approval




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Table of Contents

| | | |
|-------|---|----|
| 1 | Purpose & Scope..... | 4 |
| 2 | Policy..... | 4 |
| 2.1 | Management Commitment..... | 4 |
| 2.2 | Company Rules | 4 |
| 3 | Definitions | 5 |
| 4 | Responsibilities..... | 5 |
| 4.1 | Senior Management (Company Officers)..... | 5 |
| 4.2 | Management/Supervisors | 5 |
| | Employees | 6 |
| 4.3 | Visitors, Consultants & Subcontractors..... | 6 |
| 5 | References | 6 |
| 6 | Consultation | 7 |
| 7 | Risk Assessment and Control of Risks | 7 |
| 7.1 | Hazard Identification | 7 |
| 7.2 | Assess Risks..... | 8 |
| 7.2.1 | Risk Rating | 8 |
| 7.3 | Control of Risks..... | 9 |
| 7.3.1 | Hierarchy of Controls..... | 9 |
| 7.4 | Review of Controls..... | 9 |
| 8 | Risk Management Tools | 10 |
| 8.1 | Purchasing and Design Specifications | 10 |
| 8.2 | Safe Work Method Statement..... | 10 |
| 8.3 | Safe Work Procedures / Practices | 10 |
| 8.4 | Job Safety Analysis..... | 11 |
| 8.5 | Take 5 | 11 |
| 8.6 | Task Specific PPE..... | 12 |
| 8.7 | Damaged PPE..... | 12 |
| 8.8 | Hearing Conservation | 12 |
| 9 | Preventative Maintenance | 12 |
| 10 | Training..... | 12 |
| 10.1 | Induction..... | 13 |
| 10.2 | Contractor/Visitor Orientation | 13 |
| 10.3 | General Construction Induction Training | 13 |
| 10.4 | Site Specific Inductions..... | 13 |
| 10.5 | High Risk Work Licence..... | 14 |

10.6 Worker Competency..... 14

11 WHS Communications 14

 11.1 Toolbox Meetings 14

 11.2 Senior Management Meetings 14

 11.3 Workplace Health & Safety Communication Board 15

12 Incident Reporting and Investigation 15

 12.1 Reportable Injury 15

 12.2 Reportable Diseases 15

13 Emergency Preparedness 16

 13.1 First Aid 16

 13.2 Vehicles 17

14 Occupational Health & Hygiene 17

 14.1 Hazardous Materials Management 17

15 Fitness for Work 17

16 Injury Management 17

17 Compliance Monitoring 18

 17.1 Inspections 18

 17.1.1 Informal Inspections: 18

 17.1.2 Formal Inspections: 18

 17.2 Internal Audits 18

 17.3 External Audits 18

18 Issue Resolution **Error! Bookmark not defined.**

19 Disciplinary Action 19

 19.1 Minor Infraction 19

 19.2 Major Infraction 19

20 Safety Performance Measurement **Error! Bookmark not defined.**

 20. Leading Indicators 20

 20.1 Lagging Indicators 20

 20.4 Records 21

21 Appendix 1- Safety and health policy 22

1 Purpose & Scope

Action Glass & Aluminium is committed to Workplace Health and Safety (WHS). We believe that having sound WHS systems in place is good business practice.

The WHS Policy, Management Plan and procedures have been developed with the aim of providing and maintaining a safe work environment for all our employees and clients.

This Plan is intended as a practical document for reference by management and employees to understand and achieve our company safety objectives.

- Provide and maintain a safe work environment and systems of work.
- Identify and manage the risks to our employee's and encourage behaviour that reduces accidents /injury in the workplace.

The company Workplace Health and Safety Management Plan has been designed:

- With input from all staff;
- As a guideline for our work processes;
- To ensure we comply with the relevant legislative OSH requirements;
- To ensure that we comply to relevant Occupational Safety and Health Act 1984 and Regulations 1996 Australian Standards, Codes of Practice and Guidance Notes; and,
- In line with the core elements of the **AS/NZS 4801:2001, 4804:2001 & 3100:2009** Risk Management and Safety Management Systems.

2 Policy

Action Glass & Aluminium's WHS Policy outlines the commitment to this crucial aspect of their business. This Policy is the guiding document for the Workplace Health & Safety Management Plan. The Safety and Health policy can be seen in Appendix 1.

2.1 Management Commitment

Action Glass & Aluminium's Management is committed to providing and maintaining a safe work environment for all employees, subcontractors and the public. The WHS Policy will be reviewed annually and is signed off by Senior Management.

2.2 Company Rules

Action Glass & Aluminium believes the manner in which employees conduct themselves while working is very important to our business, continued employment and the safety of all employees.

Action Glass & Aluminium will not tolerate the following conduct:

- Working under the influence of alcohol or other drugs;
- Removal, bypass or tampering with safety devices;
- Horseplay or fighting while at work;
- Theft of the Company's, or any other property or equipment;
- Wilful damage or destruction of the Company's, or any other property or equipment;
- Entry into areas that are restricted;
- Not following safe work procedures or standards; and
- Failure to wear, use or maintain correctly personal protective equipment or clothing.

Contraventions to the above list will result in disciplinary action.

| | | |
|----------------------------------|------------------------------------|-------------------------|
| Document Number: AGA-PLA-HSE-001 | Revision Number: 11 | Revision Date: 05/04/20 |
| Authorised by: Debra Kaye | Document uncontrolled when printed | Page 4 of 22 |

3 Definitions

- AGA Action Glass and Aluminium
- PPE Personal Protective Equipment
- SWP Standard Work Procedure

4 Responsibilities

4.1 Senior Management (Company Officers)

It is the responsibility of Action Glass & Aluminium Senior Management to:

- Implement the WHS Management Plan;
- Lead by example by promoting WHS practices at every opportunity;
- Formally review the Workplace Health and Safety policy, plans and procedures to ensure compliance with legislative requirements;
- Have processes in place to ensure WHS legislative compliance;
- Ensure that the best quality person(s) are employed, taking into account the type of work to be performed, the skills, licences, certificates and qualifications required;
- Ensure that all Action Glass & Aluminium employees understand, accept and carry out their responsibilities for WHS matters and that they are trained and instructed to undertake these responsibilities;
- Review reports and inspections, and following up on recommendations;
- Coordinate incident investigations and reporting to the controller of the workplace and relevant authorities, as required;
- Coordinate WHS meetings and programs; and
- Monitor compliance with the WHS Management Plan, including Safe Work Method Statements.

4.2 Management/Supervisors

It is the responsibility of Management to:

- Implement the WHS Management Plan;
- Lead by example by promoting WHS practices at every opportunity;
- Observe all WHS rules and regulations;
- Ensure that all new employees undergo the Action Glass & Aluminium Safety Induction;
- Participate in the planning and design stages of trade activities;
- Ensure that any site-specific requirements are understood by the Action Glass & Aluminium Senior Management;
- Ensure work activities are carried out in a safe manner;
- Decide what type of WHS training is required;
- Ensure employees are only completing tasks that they are trained and competent to perform;
- Set up WHS meetings and programs;
- Help to prepare Safe Work Method Statements for high risk construction activities;
- Investigate hazard reports and ensure that they are completed, and corrective actions undertaken;
- Ensure incidents are promptly reported and participate in Incident Investigations;
- Conduct inspections of work to ensure WHS control measures are implemented and effective;

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|----------------------------------|------------------------------------|-------------------------|
| Document Number: AGA-PLA-HSE-001 | Revision Number: 11 | Revision Date: 05/04/20 |
| Authorised by: Debra Kaye | Document uncontrolled when printed | Page 5 of 22 |

- Liaise with relevant Managers and Supervisors regarding safety performance; and
- Conduct safety and toolbox meetings as appropriate;

4.3 WHS function is the responsibility of the WHS function to:

- Monitor the application of the Action Glass & Aluminium Safety Management Plan, safety policy and procedures to ensure they are relevant to current business activities;
- Monitor and report on Action Glass & Aluminium safety performance;
- Assist with the employee injury management and rehabilitation process; and;
- Obtain advice and support as appropriate to Action Glass & Aluminium management & employees.

4.4 Employees

It is the responsibility of all employees to look after their own health and the safety and that of other employees. They must also:

- Ensure that work is carried out in compliance with legislation and the safe work procedures;
- Comply with the WHS Management Plan including all Safe Work Method Statements;
- Work in a safe manner without risk to themselves or others;
- Never carry out an activity if unfamiliar with safety procedures or feel unsafe;
- Report any incidents or injuries to their Supervisor as soon as possible;
- Highlight tasks requiring the use of safe work practices prior to undertaking the work;
- Ensure the work you undertake is within your competence, qualification and authorisation;
- Immediately report any hazards identified or created;
- Provide suggestions on how to improve WHS issues;
- Seek assistance if unsure of WHS rules;
- Ensure that the work area is kept clean and tidy; and
- Use all personal protective equipment correctly.

4.5 Visitors, Consultants & Subcontractors

It is the responsibility of any person visiting, or consulting to Action Glass & Aluminium to:

- Look after their own safety and health and the safety and health of others;
- Demonstrate an acceptable level of safety performance;
- Ensure that they carry out their work in compliance with relevant legislation and Action Glass & Aluminium WHS Management Plan and procedures;
- Ensure the work you undertake is within your competence, qualification and authorisation;
- Report any hazard immediately using a hazard reporting procedure;
- Submit MSDS for any hazardous materials used in the work to the Action Glass & Aluminium prior to commencing the work;
- Report any accident or injury to Action Glass & Aluminium as soon as possible and;
- Ensure that the work area is kept clean and tidy.

5 References

- General Duty of Care- Commission for Occupational Safety and Health

| | | |
|----------------------------------|------------------------------------|-------------------------|
| Document Number: AGA-PLA-HSE-001 | Revision Number: 11 | Revision Date: 05/04/20 |
| Authorised by: Debra Kaye | Document uncontrolled when printed | Page 6 of 22 |

6 Consultation

Consultation with all parties is the key to successful management. We believe in working closely with both our clients and employees. Our aim is to continually improve communication with our employees and increase the WHS awareness at all levels in our own organisation. We believe this approach will provide the management and employees of Action Glass & Aluminium the opportunity to work together to improve safety and health.

Action Glass and Aluminium promotes the active participation of all employees in WHS decisions. Employees are consulted and given opportunity, encouragement and training to be proactively involved in WHS matters affecting the organisation and their work activities.

Consultation occurs in reference to, but not limited to, the following subjects / topics:

- hazard identification and risk assessment processes;
- control measures for the management of hazards and risks; and
- changes to the organisation's policies and procedures or work routines which may affect WHS.

7 Risk Assessment and Control of Risks

Action Glass & Aluminium recognises that hazards cannot be controlled successfully on a reactive basis only.

Hazards must be identified, the associated risks assessed and everything practicable done to control the risk. Dangerous conditions and practices must be eliminated, or at least controlled, through the management function.

Action Glass & Aluminium believes to disregard such responsibility may lead to workplace injury and disease, which in turn may impact upon the total profitability of the Company.

To minimise Action Glass & Aluminium exposure, site inspections, audits and Job Safety Analysis will be undertaken on a regular basis.

Action Glass & Aluminium also recognises the importance of legislation, which places a Duty of Care upon employees to:

- a) Identify each hazard to which a person at the workplace is likely to be exposed;
- b) Assess the risk of injury or harm to a person resulting from each hazard, if any, identified under paragraph a); and
- c) Consider how the risk may be reduced.

7.1 Hazard Identification

Action Glass & Aluminium believes the identification of workplace hazards and assessing the risks to employees are essential steps in providing and maintaining a safe and healthy work environment. Identifying hazards in the workplace involves finding things and situations that could potentially cause harm to people. Hazards generally arise from the following aspects of work and their interaction:

- Physical work environment
- Equipment, materials and substances used
- Work tasks and how they are performed
- Work design and management

Hazards will be identified by:

- Inspecting the workplace

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|----------------------------------|------------------------------------|-------------------------|
| Document Number: AGA-PLA-HSE-001 | Revision Number: 11 | Revision Date: 05/04/20 |
| Authorised by: Debra Kaye | Document uncontrolled when printed | Page 7 of 22 |

- Consulting workers
- Reviewing available information from regulators, industry associations, technical specialists, material safety data sheets, instruction manuals, etc.

The following tools will be used to identify hazards when preparing and undertaking specific tasks:

- Safe Work Method Statement (SWMS)
- Job Safety Analysis (JSA)
- Take 5

7.2 Assess Risks

Action Glass and Aluminium has identified a risk class/ranking for potential workplace hazards by referring to the categories ranging from high to low in a Risk Matrix.

When undertaking a risk assessment of the hazard, consideration will be given to the hazard in its context to gain a deeper understanding of the risk:

- People – who is involved?
- Place – include equipment and environment
- Process –is there a current procedure?

Probability: What is the potential of an incident or injury occurring given the current level of controls?

Impact: What is the potential consequence of an incident/injury given the current level of controls?

| Risk Matrix | | Probability → | | | | |
|-------------|---|--|---|--|---|---|
| | | Very Unlikely The event may occur in rare circumstances | Unlikely The event may occur sometimes | Possible The event should occur sometimes | Likely The event will probably occur in most circumstances | Very Likely The event is expected to occur in most circumstances |
| ↑ Impact | Negligible -No serious injuries or health issues | Low | Low | Low | Low | Low Medium |
| | Minor -First Aid treatment | Low | Low | Low Medium | Low Medium | Medium |
| | Moderate Medical treatment, potential LTI | Low | Low Medium | Medium | Medium | Medium High |
| | Significant -Permanent disability or disease | Low | Low Medium | Medium | Medium High | High |
| | Severe - Death | Low Medium | Medium | Medium High | High | High |

The Risk Matrix is used to determine the level of danger or seriousness (i.e. the impact) of the risk, how likely it is that this risk will occur (i.e. likelihood/probability) and therefore how detailed control measures will need to be to eliminate or minimise the risk.

7.2.1 Risk Rating

The intersection of the column and row will determine the Risk Rating. Controls will be implemented and reviewed in accordance with their rating. Proceed with any work that has a low or medium low risk rating. For all work that is a medium risk rating or above, determine and implement appropriate risk controls to reduce the risk, or halt the work. If a “high” risk rating cannot be reduced, halt work until risk can be adequately mitigated.

| Low Risk | Low Medium Risk | Medium Risk | Medium High Risk | High Risk |
|---------------------------------|--------------------------------|---|------------------|-------------|
| Acceptable with periodic review | Tolerable with periodic review | Tolerable with continuous review by supervision | Intolerable | Intolerable |

7.3 Control of Risks

The hierarchy of control is used to inform the decision of risk control.

- a) Risk control selection will follow the order of the hierarchy
- b) Selected risk controls will not introduce new (uncontrolled) risks
- c) Any new or changed risk controls will be captured on the risk assessment tool and updated accordingly
- d) Clear responsibilities and timeframes for completion of new risk controls will be established

7.3.1 Hierarchy of Controls

The ways of controlling risks are ranked from highest level of protection and reliability to the lowest.

Elimination: Physically remove the hazard in its entirety. (E.g. get rid of the dangerous machine)

Substitution: Substituting a safer process or material for the hazardous process/material identified. (E.g. replace the machine with a safer version)

Isolate: Isolate the hazard from people. (E.g. keep the machine in a closed room and operate it remotely)

Engineering: Designing and/or addition physical safety features to plant or equipment. Involves separating the hazard or hazardous work practice from employees or other work areas. (E.g. attach guards to the machine to protect workers)

Administration: Establish systems to control the risk. (E.g. modification of how the task is performed, train workers how to use a machine safely) This is most effective when used in conjunction with the other types of controls.

Personal Protective Equipment (PPE): Should only be used when all other control measures are impractical or in conjunction with other more effective control measures. (E.g. wear gloves and goggles when using a specific machine)

Risk control selection will also incorporate layers of control to ensure people, place and process are specifically and adequately addressed.

7.4 Review of Controls

Controls need to be reviewed regularly to make sure they are effective. A review of controls measures must be completed when:

- the control measure is not effective in controlling the risk;
- before a change at the workplace that is likely to give rise to a new or different health and safety risk that the existing control measures may not effectively control;
- a new hazard or risk is identified; and
- if the results of consultation indicate that a review is necessary.

8 Risk Management Tools

8.1 Purchasing and Design Specifications

Action Glass & Aluminium recognises the importance of WHS in its purchasing decisions.

Relevant Australian Standards and legislative requirements are specified within purchasing and tendering documents. Safety and health criteria within purchasing documentation include, but are not limited to, the following:

- a) All incoming chemicals are required to be accompanied by the relevant safety data sheets (SDS);
- b) All plant and equipment will be required to meet ergonomic considerations of the intended users;
- c) Machinery will be maintained to ensure that it runs as quietly as possible. e.g. noisy machinery will be transferred to other areas or noise barriers or baffles fitted to the equipment; and
- d) All plant and equipment will be provided with sufficient guarding, labelling of controls and warning signs, where appropriate; and
- e) All glass complies with relevant Australian Window and Glass Standards (AS1288).

8.2 Safe Work Method Statement

The Safe Work Method Statement (SWMS) is a work site / job planning technique conducted by management to identify hazards of planned work and determine hazard elimination, control or mitigation. The SWMS focuses on the relationship at the work site level among work activities, tools, equipment and the work environment.

SWMS will be developed for high risk construction activities as defined in the OSH Regulations. The SWMS will be prepared by the supervisor in consultation with workers directly involved in the job. The SWMS will be kept at the workplace where the high-risk construction work will be carried out and will also be kept electronically.

A generic SWMS can be prepared for works carried out on a regular basis however, the SWMS will be reviewed prior to each new activity to ensure it applies to the scope of work and revised as necessary.

SWMS will be developed when any of the following high-risk construction work tasks are required:

- Construction work involving a risk of a person falling two metres or more
- Construction work involving removing or disturbing asbestos
- Construction work involving removing or disturbing asbestos
- Work on a construction site where there is movement of powered mobile plant

SWMS will also be developed at the client's request

SWMS for high risk construction work activities will accompany a JSA

Refer: SWMS Template (AGA-FRM-HSE-006)

8.3 Safe Work Procedures / Practices

Safe Work Procedures/Practices (SWPs) are developed to provide clear direction to workers to achieve completion of their job or task in a safe and productive manner. The SWPs address the key steps and measures to be implemented or adhered to which will help to eliminate, mitigate or control the risks associated with potential hazards identified for a given work task.

Once the SWP is approved, all employees involved in performing the job will be trained in the procedure. The safe work procedure will be reviewed regularly and when there are changes to the work environment or the type of equipment used.

| | | |
|----------------------------------|------------------------------------|-------------------------|
| Document Number: AGA-PLA-HSE-001 | Revision Number: 11 | Revision Date: 05/04/20 |
| Authorised by: Debra Kaye | Document uncontrolled when printed | Page 10 of 22 |

8.4 Job Safety Analysis

A Job Safety Analysis (JSA) will be prepared for tasks that include additional risks outside of the standard operational requirements. These include:

- Any job that requires two or more workers including shower screen/ mirror, window, sliding door installations;
- Any job working above ground level;
- Oversize window /door installation at ground level;
- Balustrade removal;

Activities which are new to workers and seldom performed must be evaluated at minimum using the JSA process.

Completion of the JSA requires that controls will be developed and discussed with the crew at a pre-job meeting prior to commencing work. It will be the responsibility of the supervisor to ensure a JSA is completed and reviewed with the crew prior to beginning the work.

If a JSA has been prepared prior to arriving at the work site it will be reviewed with the workers, updated as required and each worker must complete a Take 5. The Take 5 for these standard jobs with additional risks is included in the JSA template

The JSA template also contains hazard prompts to increase awareness of hazards that may or may not be captured in the JSA and may occur on the day of the works.

Refer: JSA Template (AGA-FRM-HSE-005)

8.5 Take 5

Certain tasks may increase the risk to workers or property. Completing a Take 5 prior to commencing work will help workers identify hazards so that measures can be taken to properly control or reduce the risk. A Take 5 must be completed for all glazing activities, and for any “non-standard” measures. A “non-standard” measure will include a measure involving work off the ground, where there is a requirement to attend a pre-start meeting prior to access the area, or where there are other considerations to be taken.

9 Hazard Reporting Procedures

If any employee identifies a safety or health hazard at the workplace and is unable to control it, it must be reported to their immediate supervisor. The Supervisor managing the employee will investigate the hazard and apply suitable controls. The control measures will be documented on the Hazard Identification & Near Miss Report. All Reports will be forwarded to the WHS Officer for review to ensure the corrective action taken or controls are appropriate and effective and to be added to the Corrective Action Log.

If applicable, the site-specific reporting procedure is to be followed as well.

Where Action Glass & Aluminium employees are concerned for the management of hazards the details should be referred to the Action Glass & Aluminium Manager for internal review or discussion with the relevant site or client Manager.

If an employee identifies a hazard that poses an immediate and imminent risk to the safety and health of themselves or others that cannot be corrected by the supervisor, the Action Glass & Aluminium Issue Resolution

Refer: Hazard identification form (AGA-FRM-HSE-019)

| | | |
|----------------------------------|------------------------------------|-------------------------|
| Document Number: AGA-PLA-HSE-001 | Revision Number: 11 | Revision Date: 05/04/20 |
| Authorised by: Debra Kaye | Document uncontrolled when printed | Page 11 of 22 |

10 Personal Protective Equipment

Employees are responsible for ensuring that all PPE will be used, worn, cleaned and maintained as per the manufacturer’s instructions. All PPE must meet or exceed the applicable Australian Standard.

Standard personal protective equipment (PPE) for Action Glass and Aluminium will include:

- Hi Viz Clothing
- Safety Footwear

10.1 Task Specific PPE

Additional PPE will be made available to employees as required by the task. This may include but is not limited to:

- Gloves
- Gauntlets
- Safety Eyewear
- Hard Hats
- Ear Plugs / Ear Muffs

In addition to the above, specific PPE requirements may differ depending on the locations or job site.

10.2 Damaged PPE

Employees are not to use PPE that is damaged, or where the integrity of the PPE is in question due to impact. Employees are to return their worn or damaged PPE to their supervisor for exchange or replacement.

10.3 Hearing Conservation

Personal hearing protection devices complying with the requirements of Australian Standards AS 1269 must be used to reduce noise exposure wherever required.

Where works involve exposure to noise , an assessment will be conducted to determine the noise levels to ensure the exposure standard of 85dbA (Leg) 8hr or 140db Lin Peak is not exceeded.

11 Preventative Maintenance

Where Action Glass & Aluminium is responsible for the maintenance of plant, vehicles and equipment they will be maintained in accordance with the Original Equipment Manufacturer’s manual, applicable Australian Standards and legislative requirements.

Action Glass & Aluminium carries out regular inspections of all vehicles, plant & equipment and tools. The inspection and maintenance history of each item is documented.

Pre-start checks are completed for all equipment and tools. Schedule of maintenance and fault reports are notified to the Supervisor, documented in log books and made available to relevant parties on request.

Where equipment is hired, the same requirements as above apply.

12 Training

The scope of work being undertaken will determine the training required. Training requirements and delivery mode will be determined by Senior Management. Training may be delivered by someone familiar with the content or may be required to be delivered by a 3rd party. This training may include, but is not limited to:

| | | |
|----------------------------------|------------------------------------|-------------------------|
| Document Number: AGA-PLA-HSE-001 | Revision Number: 11 | Revision Date: 05/04/20 |
| Authorised by: Debra Kaye | Document uncontrolled when printed | Page 12 of 22 |

- Supervisor Safety Training
- Drug & Alcohol Program
- Mentorship Program
- Hazardous Materials Management
- Take 5/JSA
- Incident Investigation
- First Aid

The worker’s supervisor shall conduct a safety training needs analysis, in consultation with the relevant Action Glass & Aluminium representative, for each employee prior to commencement of work as described in the Training Management Plan. The Safety Training Needs Analysis shall identify skills required by each employee to enable them to perform their designated duties.

12.1 Induction

A Safety Induction is provided for all new employees at the time of hiring. The induction must be completed prior to the commencement of any work. The Induction includes a review that covers (at minimum) the topics of:

- WHS Responsibilities
- Fitness for Work
- Hazard Identification, Assessment and Control
- Incident Reporting
- Emergency Procedures
- PPE
- Restricted Work/Injury Management

The Induction also includes a knowledge-based assessment to verify the employee’s understanding of the Workplace Health & Safety Management Plan.

In support of the Induction process and as a way of familiarising employees with job-specific risks and procedures, supervisors will review relevant JSA and/or procedures with new employees.

Refer: Employee Induction Procedure (AGA-PRO-ADM-010)

12.2 Contractor/Visitor Orientation

An abridged Safety Induction will be completed for subcontractors or visitors to the factory and office. This Orientation will review the following topics:

- Potential hazards and controls
- Task specific safe work instructions, or review of relevant procedures
- First Aid Procedure / What to do if you are injured
- Emergency Evacuation Procedures
- Personal Protective Equipment requirement

12.3 General Construction Induction Training

All factory workers and glaziers must complete general construction induction training. This is also commonly known as ‘white card’ training.

12.4 Site Specific Inductions

Certain work sites or companies require workers to complete a company or site-specific induction. Workers will complete site specific inductions as required prior to access the specific work location.

| | | |
|----------------------------------|------------------------------------|-------------------------|
| Document Number: AGA-PLA-HSE-001 | Revision Number: 11 | Revision Date: 05/04/20 |
| Authorised by: Debra Kaye | Document uncontrolled when printed | Page 13 of 22 |

12.5 High Risk Work Licence

Workers must have a high-risk work licence as required (e.g. operating certain types of cranes or elevating work platforms).

12.6 Worker Competency

Action Glass & Aluminium recognises its obligation to:

- Place competent staff;
- Validate qualifications and certificates;
- Reference check for good safety attitudes;
- Monitor employee safety performance; and
- Ensure that all employees are placed in a role that is within their competency, physical ability and experience.

The experience, work history and qualifications of workers and equipment operators will be considered prior to their being assigned work activities.

13 WHS Communications

Action Glass and Aluminium strive to maintain two-way communication with employees regarding WHS through the following tools:

- Safety/Toolbox Meetings
- Hazard Alerts
- Sharing Learnings from Incidents
- WHS Communication Board

Action Glass & Aluminium Management will address safety issues raised by employees. A person will be delegated to follow up any issues, or to undertake follow-up action.

13.1 Toolbox Meetings

Toolbox Meetings will be held monthly at the Action Glass & Aluminium Factory and conducted by a member of Management. All factory workers, glaziers and operational staff must attend. Office personnel will be supplied with meeting minutes and they will be discussed during the office meeting.

Toolbox Meetings should briefly discuss upcoming scopes of work to be performed, any potential hazards associated with the work or the worksite, any changes that may be occurring at the site, and other pertinent information.

These meetings shall be documented and a sign off sheet shall be provided for all attending personnel to sign. Meeting minutes will describe the events of the meeting, list any issues raised and related responses or decisions for the issues.

Refer: Tool box Minutes (AGA-FRM-ADM-011)

13.2 Senior Management Meetings

Action Glass & Aluminium Senior Management meets quarterly, and Health and Safety is discussed as a formal agenda item in these meetings.

Senior Management will review the safety management plan on an annual basis, to incorporate goals for the accident prevention program, strategies to achieve the desired goals and monitoring procedures to ensure the plan is fully implemented.

| | | |
|----------------------------------|------------------------------------|-------------------------|
| Document Number: AGA-PLA-HSE-001 | Revision Number: 11 | Revision Date: 05/04/20 |
| Authorised by: Debra Kaye | Document uncontrolled when printed | Page 14 of 22 |

Results of the annual Health and Safety Audit will be reviewed and discussed to ensure continual improvement of the WHS management systems.

13.3 Workplace Health & Safety Communication Board

A WHS Communication Board will be placed in a prominent location that can be accessed by all workers. WHS Information will be available to workers in this area.

Relevant Acts, Regulations, Australian Standards, Codes of Practice, Guidance Notes and other safety-related information will be made readily available to all employees upon request.

14 Incident Reporting and Investigation

All incident and near misses involving Action Glass & Aluminium employees or subcontractors are to be immediately reported to Action Glass & Aluminium Management. Action Glass & Aluminium has a formal incident investigation and reporting procedure that will be followed.

The purpose of Incident Investigations is to provide a detailed analysis of each incident to assist in the determination of cause, and to then use the analysis to implement corrective actions and prevent recurrence.

All incidents and near misses will be investigated by a supervisor and will involve workers, supervisors, or other personnel as required. An incident tracking system is in place which includes monitoring the implementation of corrective actions. Completed incident investigations will be reviewed by Senior Management and learnings from incidents will be reviewed with employees.

Corrective Actions from incidents will be entered into the corrective actions register (AGA-REG-HSE-006)

14.1 Reportable Injury

All deaths and certain types of injury or disease, in connection with work, must be reported to WorkSafe using the OSH Act 1984 – Schedule 2 – Form 1.

- Reporting is required for:
 - employees who suffer death/injury/disease at work or at employer provided residential premises as described under s23G(2) of the Act;
 - non-employees who suffer death/injury/disease at a workplace or in connection with the business of an employer or a self-employed person; and
 - self-employed people who suffer death/injury/ disease at work or in connection with work.
- Types of injuries that must be reported:
 - A fracture of the skull, spine or pelvis.
 - A fracture of any bone in the arm, other than in the wrists or hand, or in the leg, other than a bone in the ankle or foot.
 - An amputation of an arm, a hand, finger, finger joint, leg, foot, toe or toe joint.
 - The loss of sight of an eye.

14.2 Reportable Diseases

- All deaths and certain types of injury or disease, in connection with work, must be reported to WorkSafe using the OSH Act 1984 – Schedule 2 – Form 1.
- Reporting is required for:

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|----------------------------------|------------------------------------|-------------------------|
| Document Number: AGA-PLA-HSE-001 | Revision Number: 11 | Revision Date: 05/04/20 |
| Authorised by: Debra Kaye | Document uncontrolled when printed | Page 15 of 22 |

- employees who suffer death/injury/disease at work or at employer provided residential premises as described under s23G(2) of the Act;
- non-employees who suffer death/injury/disease at a workplace or in connection with the business of an employer or a self-employed person; and
- self-employed people who suffer death/injury/ disease at work or in connection with work.
- Types of injuries that must be reported:
 - A fracture of the skull, spine or pelvis.
 - A fracture of any bone in the arm, other than in the wrists or hand, or in the leg, other than a bone in the ankle or foot.
 - An amputation of an arm, a hand, finger, finger joint, leg, foot, toe or toe joint.
 - The loss of sight of an eye.

If a Reportable Incident occurs:

- The regulator will be immediately notified by Senior Management.
- Written notification will be submitted within 48 hours, if requested by the regulator.
- The incident site will be preserved until an inspector arrives or directs otherwise.

Refer: Incident Reporting and investigation Procedure (AGA-PRO-HSE-003)

15 Emergency Preparedness

The Emergency Situation Management Manual outlines the Internal procedures to manage the following situations:

- Fire
- Emergency Evacuation
- Major Medical Incident
- Abusive Customer
- Act of Terrorism

An emergency preparedness drill will be conducted in the factory.

All workers who travel to different work sites are provided with a phone to be used in case of emergency.

Site Specific Emergency Procedures should be followed when onsite.

15.1 First Aid

A qualified and competent person shall be assigned to provide first aid service as may be required in the factory. The person(s) appointed to this position shall possess the appropriate First Aid Certificate and shall be readily available to administer first aid as necessary.

The First Aid Person shall:

- Follow all the applicable Occupational Health and Safety Regulation or Code.
- Administer first aid as necessary.
- Maintain injury records
- Requisition all first aid supplies and equipment in advance of any perceived need.
- Coordinate the transportation of injured employees to the closest advanced medical treatment centre or hospital.
- Provide health education materials or instruction to all workers as required.

| | | |
|----------------------------------|------------------------------------|-------------------------|
| Document Number: AGA-PLA-HSE-001 | Revision Number: 11 | Revision Date: 05/04/20 |
| Authorised by: Debra Kaye | Document uncontrolled when printed | Page 16 of 22 |

15.2 Vehicles

- All vehicles and equipment shall be equipped with a fire extinguisher, fire blanket, and first aid kit.

16 Occupational Health & Hygiene

16.1 Hazardous Materials Management

Employees both need and have a right to know the hazards associated with the chemicals they come in to contact with while at work.

All Supervisors and employees are to monitor products/materials arriving on site and ensure that all hazardous products include Safety Data Sheets' (SDS). These products/materials are not to be used until the SDS has been provided to Action Glass & Aluminium and approved for use. It is the duty of WHS Officer to create and maintain register of each hazardous substance, maintain SDS binders, along with distributing and ensuring access to the information to all personnel. Prior to use of the 'Controlled Product' the Supervisor will review the product label and SDS and advise employees of the safe work procedures to be followed.

17 Fitness for Work

Ensuring the Health, Safety and well-being of our employees, our customers and the public, is a core value of Action Glass & Aluminium. We recognize that an individual's fitness for work may be affected for a variety of reasons, including the misuse of alcohol & drugs and fatigue. We expect and require that all employees assist in maintaining a work environment that is free from the impairment of alcohol and drugs and that all employees report to work fit for duty.

The Action Glass & Aluminium Fitness for Work Procedure sets forth company requirements and expectations regarding maintaining a safe work environment. It also takes into consideration applicable legal considerations. The possession or consumption of alcohol, illicit drugs, or the misuse of prescription or "over-the-counter" drugs is strictly prohibited on Action Glass & Aluminium premises and work sites.

Based on reasonable cause, Action Glass & Aluminium reserves the right to conduct lawful searches for alcohol, drugs or drug paraphernalia on company premises and work sites.

In addition, all personnel shall provide a sample that is negative for presence of illicit or illegal drugs or the presence of alcohol prior to employment. Personnel whose samples do not reflect a negative result will not be employed.

All personnel directly involved in an incident are subject to post-incident testing.

Action Glass & Aluminium Fitness for Work Procedure includes, the Duty to Accommodate, providing substance abuse treatment and return to work program.

18 Injury Management

Action Glass & Aluminium believes providing suitable Injury Management / Rehabilitation assistance is essential to enable a quick and productive return to pre-injury duties once an injury has occurred. The Action Glass & Aluminium Return to Work Program is made available to all employees who have suffered from any injury or illness related to or sustained while in the performance of their assigned duties.

It is important that all injuries are managed properly. We aim to ensure that our employees understand their value to us, and the benefits of an early return to productive work.

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|----------------------------------|------------------------------------|-------------------------|
| Document Number: AGA-PLA-HSE-001 | Revision Number: 11 | Revision Date: 05/04/20 |
| Authorised by: Debra Kaye | Document uncontrolled when printed | Page 17 of 22 |

19 Compliance Monitoring

19.1 Inspections

Management will conduct periodic and regularly scheduled formal and informal inspections in all work areas. The findings will be documented, and key follow-up items captured on a Corrective Action Log. The findings and observations will be communicated to workers via Toolbox Meetings and Safety Bulletins. Any deficiencies, which are identified, will have corrective actions defined, prioritized and assigned to an Action Glass & Aluminium employee for closure.

The purpose of the Inspection process is:

- To provide a system to identify workplace hazards.
- To identify potential hazards prior to their involvement into an incident.
- To evaluate employee’s safe work standards.

19.1.1 Informal Inspections:

Informal (non-documented) inspections will be conducted on an ongoing basis by all supervisory staff. Any deficiencies noted will be rectified as soon as practicable. Supervisors are to make notation in their journal (or similar) as to any deficiencies which are observed during the information inspection process or document using the Hazard Identification & Near Miss Report.

19.1.2 Formal Inspections:

Formal (documented) inspections will be conducted on a weekly basis. All noted deficiencies will be rectified as soon as practicable. Outstanding deficiencies will be recorded on the Corrective Action Log, responsible parties and dates for completion will also be assigned.

19.2 Internal Audits

The aim of auditing our systems is to identify deviations from the policies and procedures. The purpose of auditing established systems is to determine if unexpected deviations have occurred, to ascertain if changes are necessary to the policies and procedures or if new systems or procedures need to be developed. This will ensure the systems are appropriate and effective.

The internal audit will use a system of performance indicators (leading and lagging) to measure the operation of the WHS management system. Achieving Action Glass & Aluminium’s targets for leading indicators will ensure improved performance against lagging indicators.

An annual audit will be completed to measure compliance with Action Glass & Aluminium policies and procedures. Internal audits will include:

- Review of training received by Supervisors and workers
- Review of compliance to and effectiveness (quality) of the various Leading Indicator activities
- A formal WHS program review
- Review of lagging indicator results
- Review of various WHS related documents, forms and reports
- Site inspection and observation tour
- Interviews of key personnel

19.3 External Audits

An external audit of the Action Glass & Aluminium Safety Management Plan will be completed every two years to measure compliance with policies and procedures.

Action Glass & Aluminium will retain copies of all audits conducted. Action Glass & Aluminium Senior Management will examine the audit findings and where necessary, assign corrective actions.

| | | |
|----------------------------------|------------------------------------|-------------------------|
| Document Number: AGA-PLA-HSE-001 | Revision Number: 11 | Revision Date: 05/04/20 |
| Authorised by: Debra Kaye | Document uncontrolled when printed | Page 18 of 22 |

19.4 Corrective Actions

All corrective actions arising from health and safety incidents, complaints, inspections and audits or other non-conformances, will be entered into the Corrective Action Register

Where the risk is serious and imminent immediate control measures must be implemented to address the hazard and eliminate or reduce the risk to as low as reasonably practicable.

- All corrective action identified are categorised into the following:
 - Corrective actions required immediately
 - Corrective actions within 7 days
 - Corrective actions within 30 days

Refer: Corrective Action Register (AGA-REG-HSE-006)

19.5 Issue Resolution

AGA utilize less formal workplace arrangements that assist in meeting the requirement to consult and co-operate with employees on safety and health:

- Safety and health is a standing agenda item at workplace meetings
- Safety is discussed at toolbox meetings.
- Safety notices and alerts are issued to encourage discussion and feedback on issues.

19.6 Disciplinary Action

It is Action Glass & Aluminium’s policy that all employees be trained in proper safe work practices and employees are expected to follow and adhere to all aspects of the Action Glass & Aluminium’s Workplace Health & Safety Program. The close observance of all jurisdictional, owner and/or client rules and regulations will be monitored at all times.

If there is an infraction of these rules, regulations or the Action Glass & Aluminium’s Workplace Health & Safety Program, the following disciplinary action will be taken:

19.6.1 Minor Infraction

Definition: Any infraction of government, corporate, or client rules that does not have the potential to cause serious damage or injury.

- 1st offense verbal warning
- 2nd offense verbal warning and letter to personnel file
- 3rd offense time off without pay or termination
- 4th offense termination

19.6.2 Major Infraction

Definition: Any infraction of government, corporate, or client rules or legislation that does have the potential to cause serious damage or injury.

- 1st offense time off without pay or termination
- 2nd offense termination

| | | |
|----------------------------------|------------------------------------|-------------------------|
| Document Number: AGA-PLA-HSE-001 | Revision Number: 11 | Revision Date: 05/04/20 |
| Authorised by: Debra Kaye | Document uncontrolled when printed | Page 19 of 22 |

19.7 Safety Performance Measurement

The safety performance of Action Glass & Aluminium Management and Supervisors will be assessed using a set of Leading Indicators or pro-active measures as well as lagging indicators to measure the overall safety performance. Targets will be set by Senior Management annually.

19.7.1 Leading Indicators

The leading indicators that will be measured include:

- The number of workplace risk assessments completed;
- The number of workplace safety inspections/spot checks performed;
- The number of employee safety suggestions implemented; and
- The number of corrective actions completed.

Leading Indicators will be recorded quarterly.

| | Q1 | Q2 | Q3 | Q4 | Target (annual) |
|-------------------------------------|----|----|----|----|-----------------|
| Workplace Risk Assessments | | | | | |
| Inspections | | | | | |
| Corrective Actions Completed | | | | | |
| Hazard Alerts | | | | | |

19.7.2 Lagging Indicators

Lagging Indicators that will be tracked are Lost Time Injury Frequency Rate, Serious Injury Frequency Rate, Severity Rate and Incidence Rate which will be calculated using the following formulas.

Lost Time Injury Frequency Rate (LTIFR):

$$\frac{\text{Number of Lost Time Injuries} \times 1,000,000}{\text{Number of hours worked}}$$

Serious Injury Frequency Rate (SIFR):

$$\frac{\text{Number of Lost Time + Medical Treatment injuries} \times 1,000,000}{\text{Number of hours worked}}$$

Severity Rate:

Number of days lost per Lost Time Injury

Incidence Rate:

$$\frac{\text{Number of Lost Time Injuries} \times 100}{\text{Average number of employees}}$$

19.7.3 Incident Statistics

The following summaries of incident statistics will be collated and presented to the Action Glass & Aluminium Senior Management for discussion.

| | Q1 | Q2 | Q3 | Q4 |
|----------------------------|----|----|----|----|
| Near Miss Incidents | | | | |
| First Aid Incidents | | | | |

| | | | | |
|------------------------------------|--|--|--|--|
| Medical Treatment Incidents | | | | |
| Restricted Work Incidents | | | | |
| Lost Time Incidents | | | | |
| Property Damage Incidents | | | | |
| Total Exposure Hours | | | | |

| Financial or Calendar Year | # of SIs | # of LTI/Ds | Total Hours | SIFR | LTIFR | Total Employees | Incident Rate |
|-----------------------------------|-----------------|--------------------|--------------------|-------------|--------------|------------------------|----------------------|
| Year 1 | | | | | | | |
| Year 2 | | | | | | | |
| Year 3 | | | | | | | |
| 3 Yr. Average | | | | | | | |

19.8 Records

All records shall be recorded and maintained in accordance to the Action Glass & Aluminium Document Control Process. Records will be kept for the following:

- Record of Injury
- Incident Investigation Reports
- Inspection Forms / Spot Checks
- Toolbox Meeting Minutes
- Training
- Induction
- Safety Statistics
- WHS Management System Audits

20 Appendix 1- Safety and Health Policy

Occupational Safety & Health Policy

Action Glass & Aluminium Pty Ltd understands Workplace Health and Safety (OSH) is an integral part of its business operations. We believe no business priority comes before safety.

We will strive to continually improve our systems and processes. This will be done by continually monitoring our business activities and implementing beneficial changes when needed.

The Action Glass & Aluminium business is committed to the health and safety of all our employees.

The Action Glass & Aluminium team is actively involved in the management and planning of Workplace Health and Safety. We have aligned our safety management system to meet the requirements of the AS/NZS: 4801.2001, current Safety Legislation including the Act, Regulations, Standards and Codes of Practice as best practice.

We encourage our employees to be active in observing and recommending changes in the workplace to reduce exposure to any risks and hazards.

Action Glass & Aluminium expect all our employees to accept responsibility for their actions, to report unsafe acts and working conditions, and behave in a manner that reflects safe work practices and standards.

If at any time illness or injury results in a disability to our employees, Action Glass & Aluminium will manage the Injury Management process to facilitate their safe return to gainful and meaningful employment.



John Mitsikas
Managing Director

16/05/2018

| | | |
|----------------------------------|------------------------------------|-------------------------|
| Document Number: AGA-PLA-HSE-001 | Revision Number: 11 | Revision Date: 05/04/20 |
| Authorised by: Debra Kaye | Document uncontrolled when printed | Page 22 of 22 |