

# Work Health & Safety Policy

The Kypreos Group of Companies (the Group) are committed to achieving a positive safety culture throughout our businesses. We recognise that we have statutory and moral obligations to provide and maintain a working environment that is safe, without risk to the health, safety and welfare of employees, contractors, subcontractors, suppliers, visitors, the general public and other workplace users as far as is reasonably practicable.

## What does it mean

The well being of people employed at work or people affected by our work is a priority and must be considered during all work performed on our behalf.

Our Officers (Directors and Senior Management) acknowledge the duty to ensure compliance with statutory obligations and the implementation and timely reviews of the Groups Business Management Systems as well as client's requirements.

The Group expects all who have, or seek to have, a business relationship with the Group entities to familiarise themselves with this policy and to act in a way that is consistent with its values.

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## Our Objectives

- Provide a supportive safety culture through visible, consultative and accountable leadership.
- Maintain Business Management Systems that complies with legislative and regulatory requirements and also act in accordance with relevant standards including AS/NZS ISO 45001.
- Continue to promote and develop employee, contractor and supplier awareness of their legal responsibilities and compliance WHS requirements.
- Eliminate or control hazards, review health and safety performance and educate workplace operatives in health and safety management through the continued participation in active consultation, cooperation, and communication.
- Implement, refine, and regularly review effective risk management processes.

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## We Will

- Appoint a safety management representative who will be responsible as far as reasonably practicable for the establishment, implementation, monitoring and maintenance of the Groups Business Management System and WHS Management plans, that are practical and relevant to our business processes and activities and reporting the overall performance to our officers and senior management for review on a monthly basis for continuous improvement opportunities.
- Establish and communicate measurable objectives, targets and performance measures on corporate, functions, and workplace levels to ensure continued improvement aimed at elimination of work-related illness and injury with reviews monthly against the set targets and key performance indicators.
- Review the company's 'Policy' and Management System for continuing suitability annually as part of corporate and workplace management reviews and communicate outcomes to various levels and functions throughout our businesses and workplaces.
- Ensure all reported incidents and occurrences are investigated, recorded, root causes identified, risk evaluated, and that corrective actions, where required, are implemented across all workplaces and sites.
- Implement a monitoring and measurement process which includes inspections and auditing of all the current processes and activities.

# Work Health & Safety Policy

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## We Will Continued...

- Ensure that all plant and substances, including contractors, subcontractors and suppliers are safe, appropriate for the activities, inspected, maintained and without risk to health.
- Develop health and safety awareness throughout the Group by planning and implementation of training processes which will provide guidance for the on-going education and training of all staff, employees, suppliers, subcontractors, and other stakeholders.
- Allocate sufficient resources to meet the commitments of this 'Policy'
- This signed 'Policy' statement will be displayed throughout our offices and facilities and communicated to all our employees and interested parties as part of inductions and training.

# Worker Fatigue Management Policy

The Kypreos Group of Companies (the Group) are committed to the provision and maintenance of a safe system of work for all of its employees, including those who work in a shift work or on-call roster environment.

## What does it mean

Fatigue is defined as a subjective experience that results from a lack of sufficient restorative sleep and/or quality of sleep. This can be induced by the work environment (work related fatigue) and non-work activities and lifestyle.

This 'Policy' covers all our employees (including part-time, temporary, casual and suppliers) and will be applied to all rosters.

The Group expects all who have, or seek to have, a business relationship with the Group entities to familiarise themselves with this policy and to act in a way that is consistent with its values.

## Our Objectives

- Implement a framework for fatigue management to ensure that risks associated with fatigue are minimised.
- Comply with legislative requirements in relation to fatigue management.
- Have utilised and adopted a risk management approach when assessing work related fatigue.
- Foster and promote a safety culture which provides a clear understanding of obligations and accountabilities for managing fatigue.

## We Will

- Ensure all employees are competent in managing the risks associated with fatigue in the workplace through training and awareness.
- Ensure stakeholders are aware that the management of fatigue is a shared responsibility between managers, supervisors, and employees on a day-to-day basis.
- Ensure that we comply with reporting requirements prescribed under fatigue management legislative and regulatory requirements.
- Recognise signs of sleep deprivation and or fatigue and require it to be reported to the supervisor in circumstances in which there may be impacts on individual well being and workplace safety.
- Ensure that all fatigue management risks are identified, assessed, and controlled in accordance with the relevant procedures in our business management system.
- Ensure that employees are involved in the development and design of rosters to ensure that schedules and workloads are reasonable and practicable for a particular workplace utilising a collaborative approach to the risk management of all rosters.
- Review the implementation and effectiveness of the fatigue management process as part of management reviews on an annual basis in order to generate further development and improvement to the management process.
- This 'Policy' statement will be displayed throughout our offices and facilities and communicated to all our employees as part of inductions and training.

# Traffic Management Policy

The Kypreos Group of Companies (the Group) committed to providing a safe workplace environment at all of our work sites throughout the various Australian states and territories.

## What does it mean

We are aware of the need for correct and effective procedures, management plans and the maintenance of uniformity in the display and operation of warnings and notices in and near a roadway and within worksites generally.

The health, safety and wellbeing of our employees, suppliers, workplace operatives and members of public, are of key in creating a safe and productive workplace.

## Our Objectives

- Undertake a systematic and planned consideration of the conditions to be encountered at each worksite and design a specific plan for the control of general traffic, construction plant, vehicles, and pedestrian movements.
- Comply with all regulatory and legislative requirements and to meet industry standards.
- Provide a safe working environment that takes into consideration public impacts and safety.

## We Will

- Communicate our procedures and plans to all relevant employees and stakeholders as appropriate, to ensure they are aware of their obligations with respect to our operations and activities.
- Liaise with affected parties and stakeholders through effective and practical communication channels.
- Provide health, safety and traffic risk management procedures that are relevant to the nature and scale of work undertaken
- Conduct planned monitoring and measurement activities such as inspections and audits in order to evaluate our compliance with the planned arrangements as well as the effectiveness and relevance of the control measures.
- Ensure the continual education of our personnel with the required relevant training and regular updates on industry changes.
- Senior management review and revise the 'Policy', procedures and plans annually so as to ensure and maintain their relevance and effectiveness.
- This 'Policy' statement will be displayed throughout our offices and facilities and communicated to all our employees and interested parties as part of inductions and training.



# Heavy Vehicle Driver Fatigue Management Policy

The Kypreos Group of Companies (the Group) share responsibility with its Heavy Vehicle drivers and other Chain of Responsibility parties. The Group is committed to ensuring a safe work environment for Drivers, other road users and members of the public by promoting effective fatigue management practices.

## What does it mean

The Group expects all who have, or seek to have a business relationship with the Group entities to familiarise themselves with this policy and to act in a way that is consistent with its values.

The Group has developed this Heavy Vehicle Fatigue Management policy, in addition to procedures and processes designed to ensure compliance. This 'Policy' is a statement of the Groups commitment to ongoing best practice and clarifies the responsibilities for fatigue management

This policy applies to the Group and its activities, sites, or project for which the group is responsible for the management of fatigue.

## We Will

- Require executives/Managers to consult with drivers and CoR parties about fatigue management practices
- Require Executives/Managers to monitor and review the effectiveness of fatigue management measures.
- Hold meetings for our Executives/Managers on the topic of fatigue management in which they consider control measures that eliminate or reduce the risks associated with Driver fatigue
- Educate executives/managers on a range of strategies, knowledge and skills required to identify and manage fatigue.
- Monitor the 'Policy' and associated procedures and assess them in order to maintain its relevance and effectiveness through inspections and audits as well as our annual management review meetings.
- Ensure that our drivers comply with maximum work time and minimum rest time requirements when driving fatigue regulated heavy vehicles.
- Implement measures and conduct checks necessary to ensure that our drivers do not drive while impaired or unfit for duty.
- Ensure that drivers comply with all legislative and regulatory requirements such as completing log books and work diaries and undertaking a medical fitness for work prior to commencing work.
- Require that drivers participate in fatigue management training.

## Our Objectives

- Provide and maintain a Chain of Responsibility(CoR) Fatigue Management System for the Group which meets legislative requirements.
- Provide comprehensive clear guidelines for all our employees so that they can comply with their legal responsibilities for the management of, including reporting breaches of CoR legislation.
- Monitor our Group entities, subcontractors and suppliers to ensure compliance with fatigue management.

# Heavy Vehicle Driver Fatigue Management Policy

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## We Will Continued...

- We also make provision for our contracted suppliers to hold their own suppliers accountable to the same standards. We also reserve the right to terminate any contractual arrangement if there is a breach of this policy.
- Allocate sufficient resources to meet the commitments of this policy.
- Display this 'Policy' statement throughout our offices and facilities and communicate to all our employees and interest parties as part of inductions and training.
- Review the 'Policy' for continuing suitability and relevance on an annual basis as part of corporate management reviews.

# Mass Dimension Load Policy

The Kypreos Group of Companies (the Group) Mass Dimension Load Policy is to ensure heavy vehicle loading and unloading operations are completed safely and to eliminate the potential for injuries where vehicle and people interaction occurs. The Group has developed and maintains this policy which is supported by procedure, risk assessment and guidelines for the management of mass, dimension and loads moved.

## What does it mean

The group expects all who have, or seek to have, a business relationship with the Group entities to familiarise themselves with this policy and to act in a way that is consistent with its values.

The Group will proactively aim to follow and meet all legislative and regulatory requirements on load position and distribution.

## Our Objectives

- To eliminate all risks associated with loading mass dimensions.
- To achieve compliance with all relevant laws and regulations.
- To create a zero-harm work environment by understanding the importance of and by promoting the safety of heavy vehicles on the road.

## We Will

- Ensure that the height and weight of our vehicles do not exceed the limits of vehicles as specified by relevant laws and regulations.
- Ensure that long loads are assigned to suitable vehicles with consideration to body length, containment, and centre of gravity.
- Educate heavy vehicle drivers about the risks and penalties associated with mass, dimension and loads.
- Monitor the 'Policy' and associated procedures and assess them in order to maintain its relevance and effectiveness through inspections and audits as well as our annual management review meeting
- Require the Transport Manager or delegate to perform periodic Audits of Mass, Dimension and Load Restraint. This will include but not limited to:
  - Being asked to weigh in at the weigh bridge to verify the mass
  - Measuring the dimensions of goods in transit
  - Auditing load restraint
- Allocate sufficient resources to meet the commitment of this 'Policy'.
- This 'Policy' statement will be displayed throughout our offices and facilities and communicated to all our employees as part of inductions and training.
- Review the 'Policy' for continuing suitability and relevance on an annual basis as part of corporate management reviews.
- Take necessary disciplinary action against any worker who breaches this policy.

# Mass Dimension Load Policy

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## Heavy Vehicle Drivers will

- Comply with Work Instructions, SWMS and Risk Assessments relating to the load they are carrying.
- Advise and educate heavy vehicle drivers to report to the Group Transport Manager immediately of faulty equipment, incorrect equipment or missing equipment which will make the load unsafe.
- Advise and educate heavy vehicle drivers to report any and all incidents/accidents relating Mass/Dimension/Load Management to the Group Transport Manager immediately.
- Require heavy vehicle drivers to attend Training or Toolbox meetings as required.



# Environment & Sustainability Policy

The Kypreos Group of Companies (the Group) are committed to achieving excellence in its day-to-day activities and ensuring those activities are environmentally sustainable through the effective management of the risks associated with the environment, heritage, and community.

## What does it mean

We will strive to strike the balance between delivering economic and operational outcomes during all activities which the group undertakes whilst meeting our social and environmental obligations.

The Kypreos Group recognises that a successful future for our business depends on sustainability of the environments, communities, and economies in which we operate.

## Our Objectives

- Continual improvement and the prevention of pollution through regular reviews of our environmental performance.
- Identify the environmental aspects and impacts associated with business activities and ensure effective risk control measures are in place.
- Comply with all applicable legislative and regulatory requirements identified and associated with relevant environmental aspects and impacts.
- Promote sustainability through the integration of good environmental practice, sensitive management of heritage and strong relationship management both internally and with our stakeholders.

## We Will

- Set frameworks that strive to minimise our environment, heritage, and community impacts through the application of appropriate risk management techniques.
- Promote a culture of innovation, engagement, and participation towards all activities. This will be achieved by embracing behaviours that contribute to a sustainable culture.
- Require our management team to demonstrate strong leadership by doing what they say they will do and encourage employees to participate in environmental and sustainability initiatives.
- Setting environmental, heritage and community related objectives and targets such as energy efficiency and resource efficiency initiatives
- Strive to achieve leading industry practice and develop, implement, and maintain management systems and practices that meet legislative and regulatory requirements including AS/NZS ISO 14001.
- Provide our employees with the information, training and support they require to meet environmental and sustainability objectives.
- Allocate sufficient resources to meet the commitments of this 'Policy'.
- Display this 'Policy' statement throughout our offices and facilities and communicate to all our employees and interested parties as part of inductions and training.
- Review the 'Policy' for continuing suitability and relevance on an annual basis as part of corporate management reviews.

# Community/Stakeholder Engagement Policy

The Kypreos Group of Companies (the Group) is committed to preventing and addressing the risk of modern slavery occurring within its own businesses or its supply chains. This policy applies to all persons working for or on behalf of the Group, in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative.

## What does it mean

The Group will facilitate discussion and communication between the various parties in the planning, determination and evaluation of policies, plans and programs provided across the scope of projects and activities undertaken by the Group.

The Group expects all who have, or seek to have, a business relationship with the Group entities to familiarise themselves with this policy and to act in a way that is consistent with its values.

## Our Objectives

- Successful community consultation dependant on mutual trust, transparency and effective communication with and between the community and other stakeholders.
- Development of shared understanding of, and a commitment to, the participating parties' philosophy and objectives with respect to any particular consultation program or activity within sufficient time frame.
- Ensure employees undertake activities in ways that engender community and other stakeholders' confidence in, and understanding of, the various consultation processes that are undertaken.

## We Will

- Carefully consider and review any community and stakeholder complaints.
- Ensure that all complaints are investigated and dealt with appropriately by applying any remedial, corrective, or preventative actions in consultation with the complainant, where possible.
- Undertake consultation with impacted community and other stakeholders through a variety of forms and methods such as public notices, direct mail, media releases, and invitations on the website, community meetings, surveys, and the involvement of dedicated community engagement personnel.
- Ensure that we use community consultation as a key element in our companies' and its client's decision-making process. Community consultation is part of a broader sphere of activity that includes public relations, research and related activities.
- Allocate sufficient resources to meet the commitments of this 'Policy'.
- Display this 'Policy' statement throughout our offices and facilities and communicate to all our employees and interested parties as part of inductions and training.
- Review the 'Policy' for continuing suitability and relevance on an annual basis as part of corporate management reviews.

# Local Procurement Policy

The Kypreos Group of Companies (the Group) is committed to ensure that it achieves value for money in its procurement of goods and services, whilst where possible giving preference to local suppliers, and non-local suppliers using local content, when undertaking and executing its projects to support the local community economic development

## What does it mean

Both major construction and short-term projects can have economic, social, and environmental impacts on local communities.

The Group's Local Procurement Policy recognises that overall value for money is about the broader economic benefits to the communities which are affected, rather than opting for the lowest price.

## Our Objectives

- Maximise positive and minimise any negative social and environmental impact of our projects upon local communities.
- Support the local community by procuring local raw materials, workers and contractors and engaging wherever possible from the local community.

## We Will

- Encourage a 'buy local' culture within its project management teams.
- Employ local people on our projects whenever we can.
- Keep local communities informed through organised public consultation and take steps to mitigate any concerns they may have.
- Encourage local suppliers to tender for works by advertising in local newspapers and other means appropriate
- Ensure that procurement policies and procedures do not disadvantage local suppliers
- Work with local councils/clients to ensure compliance to their local procurement policies.
- Work with government agencies and clients to provide opportunities for sustainable employment and apprenticeships for local people.
- Proactively engage with communities through partnership schemes (e.g. local schools' engagement) to create value beyond the delivery of the project.
- The Kypreos Group recognises that a successful future for our business depends on the sustainability of the communities in which we operate, and this policy is a statement of that recognition and commitment.
- This 'Policy' statement will be displayed throughout our offices and facilities and communicated to all our employees and interested parties as part of inductions and training.



# Partnering & Relationship Management Policy

The Kypreos Group of Companies (the Group) will pursue a collaborative approach across our operations, through demonstrating respect and professionalism, improving communication, and striving to build strong and lasting relationships that add value.

## What does it mean

The Group expects all who have, or seek to have, a business relationship with the Group entities to familiarise themselves with this policy and to act in a way that is consistent with its values.

The Group recognises that upholding the highest standards of ethical business conduct will strengthen our relationships and our reputation. We believe our clients and customers should be able to expect the same standards from us as we expect from our colleagues and others. We work openly, fairly, and ethically to build lasting relationships and deliver the highest value for our clients.

## Our Objectives

- Work openly and collaboratively with our clients, customers, supply chain, and other stakeholders resolving disputes in a non-adversarial manner.
- Communicate honestly and transparently at all times, seeking to develop strong and lasting relationships.
- Determine and agree on forms of collaboration by all participating parties.

## We Will

- Establish partnering charters, as required in conjunction with details of the overall workplace plan and communication protocols between the teams various parties, support groups and committees.
- Engage with stakeholders openly to increase our knowledge of related issues to aid planning.
- Ensure work is completed to the agreed timelines, quality and cost targets and with the highest standards of professionalism.
- Always act fairly, transparently, and ethically when selecting suppliers and partners.
- Never forget that satisfying our clients/customers is critical to the success of our business.
- Never ignore concerns raised by our clients/customers regarding the quality of our work.
- Never act unprofessionally when interacting with any stakeholder
- Where applicable, execute and refine protocols whereby the relationship between all contracting parties results in an open exchange of information and processes for the benefit of all participants.
- Undertake partnering status workshops and surveys to assess the partnering health. Outcomes of partnering meetings/workshops, surveys, reports (i.e. KRA's status, budget, strategy outcomes) will be reviewed for weaknesses and strength for potential improvements.



# Partnering & Relationship Management Policy

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## We Will Continued...

- Monitor our Group entities, subcontractors, and suppliers to ensure compliance to the policy.
- Allocate sufficient resources to meet the commitments of this 'Policy'.
- Display this 'Policy' statement throughout our offices and facilities and communicate to all our employees and interested parties as part of inductions and training.
- Review the 'Policy' for continuing suitability and relevance on an annual basis as part of corporate management reviews

# Quality Management Policy

The Kypreos Group of Companies (the Group) believe in providing quality products and services within time and budget whilst maintaining the highest level of customer satisfaction in order to preserve our future business.

## What does it mean

The Group expects all who have or seek to have a business relationship with the Group entities to familiarise themselves with this policy and to act in a way that is consistent with its values.

The Group will Maintain a Business Management System that meets ISO AS/NZS 9001 and accreditation to the relevant State, Territory and National schemes.

## Our Objectives

- Deliver a quality product which meets our clients' expectations and satisfaction.
- Improve the quality of our products and services to reduce the occurrence of non-conformity at all levels of the business and all stages of contracts.
- Develop the skills of our people to meet the needs of the changing environment.
- Promote a culture of innovation and participation by engaging and encouraging our employees to contribute to the continuous improvement of the Group's quality performance.

## We Will

- Appoint a quality management representative who will be responsible for the establishment, implementation, monitoring and maintenance of Business Management Systems and Quality Management Plans that are practical and relevant to our business processes and activities.
- Establish and communicate measurable objectives, targets and performance measures on corporate, functions and workplace levels and undertake regular reviews of progress against the targets set, annually or as otherwise may be required.
- Monitor and review repeat non-conformances in order to implement effective corrective and preventive actions.
- Implement a monitoring and measurement process which includes the inspection and auditing of all the current processes and activities.
- Develop quality awareness throughout the group by education and training of all management teams, operational managers, employees, subcontractors, and suppliers.
- Influence our contractors and suppliers to act in a manner consistent with our principles as outlined in this 'Policy'.
- Obtain client feedback in order to maintain and strive for client satisfaction and opportunities for improvement.

# Quality Management Policy

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## We Will Continued...

- Review the 'Policy' and Business Management System for continuing suitability and relevance on an annual basis as part of corporate and project management reviews and communicate outcomes to the various stakeholders, management teams and operational managers throughout the workplaces.
- Allocate sufficient resources to meet the commitments of this 'Policy'.
- This 'Policy' statement will be displayed throughout our offices and facilities and communicated to all our employees and interested parties as part of inductions and training.

# Employee Wellbeing Policy

The Kypreos Group of Companies (the Group) are committed to holding the wellbeing of its employee's paramount. In doing so, the Group endeavors to create and foster a work environment without exposing employees to any excessive risk of psychosocial hazards.

## What does it mean

The Group expects all who have, or seek to have, a business relationship with the Group entities to familiarise themselves with this policy and to act in a way that is consistent with its values.

The Group will seek to promote, protect, and support the risk minimisation of all psychosocial risks as we understand that in doing so build healthy employee wellbeing and a healthy workplace.

Examples of (not limited to) psychosocial risks include workload management, bullying, inappropriate behaviour and unreasonable or unsuitable workload.

Prioritising the minimisation of psychosocial risks within the workplace is paramount in ensuring healthy and safe wellbeing of all employees.

## Our Objectives

- Create awareness, increase knowledge, skills, and capability in identifying and managing psychosocial risks in the workplace.
- To protect employees against psychosocial risks.
- Preserve and uphold employees' right to a safe work environment without being subjected to risks of physical or psychological harm.

## We Will

- Provide Leadership and management the framework to review and effectively manage inappropriate or hazardous workplace behaviors.
- Engage with employees as part of consultation processes to manage associated risks/hazards.
- Systematically collect and review relevant information.
- Educate employees on how to identify psychosocial hazards.
- Implement an effective risk management system that identifies, assesses and controls risks of excessive stress and fatigue.
- Understand that addressing and responding to psychosocial reports require sensitivity, therefore we treat all reports with the utmost care and respect.
- Provide appropriate avenues for redress that are approachable and reasonable.
- Comply with all legislative and regulatory requirements to achieve the objectives set out in this policy.
- Allocate sufficient resources to meet the commitments of this 'Policy'.
- Display this 'Policy' statement throughout our offices and facilities and communicate to all our employees and interested parties as part of inductions and training.
- Review the 'Policy' for continuing suitability and relevance on an annual basis as part of corporate management reviews.



# Workers Compensation & Injury Management Policy

The Kypreos Group of Companies (the Group) are committed to the prevention of injury and illness through the provision of a safe working environment by successful management and training of all employees in respect of workplace health, safety, and welfare.

## What does it mean

The Kypreos group shall endeavour to prevent any injury occurring.

In the event that an injury occurs, there shall be a process and mechanism in place to support the workers recovery and return to work.

The Group expects all who have, or seek to have, a business relationship with the Group entities to familiarise themselves with this policy and to act in a way that is consistent with its values.

## Our Objectives

- Provide and maintain an Injury Management System for employees injured at work, which achieves the earliest possible and safe return to work.
- Provide comprehensive clear guidelines for all our employees, in order that they comply with their legal responsibilities for reporting injuries and Occupational Rehabilitation as outlined in the Workplace Health and Safety (WHS) and Workplace Injury Management & Workers Compensation legislation.
- Support the return to work of the injured person and to create a positive accepting environment.

## We Will

- Ensure that all staff and workers are committed to achieving the standards and time frames set for the reporting of workplace injuries and processing of claims for compensation.
- Establish protocols whereby all reported workplace injuries are assessed for rehabilitation needs.
- Established protocols whereby all relevant parties including the injured employee, rehabilitation coordinator and employers' representative are involved in the formulation of suitable rehabilitation programs to facilitate a successful return to work for injured staff.
- Educate all staff and workers regarding their rights and responsibilities in relation to claims for compensation and in implementing return to work programs of an injured employee.
- Seek employees' cooperation and commitment in meeting their workers compensation and injury management obligations imposed by the Workplace Injury Management and Workers Compensation legislation.
- Allocate sufficient resources to meet the commitments of this 'Policy'.
- Display this 'Policy' statement throughout our offices and facilities and communicate to all our employees and interested parties as part of inductions and training.

# Workers Compensation & Injury Management Policy

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## We Will Continued...

- Review the 'Policy' for continuing suitability and relevance on an annual basis as part of corporate management reviews including monitoring the return-to-work rate of injured staff, cost of rehabilitation, reviewing the workers compensation statistics including day's lost and total number of claims and through consultation with employees and their representatives.

# Harrassment & Bullying Policy

The Kypreos Group of Companies (the Group) does not offer or accept bribes or engage in any form of corruption, whether directly within the Kypreos Group of Companies (the Group), our supply chains or through any other business relationship. This policy applies to all persons working for or on behalf of the Group, in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative.

## What does it mean

The Group has established this 'Policy' in recognition and endorsement of its commitment to equal opportunity in employment.

The Group acknowledges its obligations under Australian and State equal opportunity and anti-discrimination and work health and safety legislation.

The Group expects all who have or seek to have a business relationship with the Group entities to familiarise themselves with this policy and or act in a way that is consistent with its values.

## Our Objectives

- Apply the 'Policy' to all employees without exception.
- Provide a work environment to our employees that's free of any harassment, bullying or victimisation.
- Protect and support those who raise a complaint in good faith.
- Determine the appropriate course of resolution process and the subsequent disciplinary action, considering any recommendations made during the investigation where the allegations are substantiated or admitted.

## We Will

- Encourage the prompt resolution of concerns and complaints of bullying, discrimination, or harassment within the workplace.
- Educate workers on their duties in relation to workplace bullying and harassment.
- Provide a system which promotes the development of healthy and respectful workplace relationships.
- Investigate all harassment, bullying or victimisation complaints immediately and thoroughly.
- At the request of the complainant or the alleged offender, if the allegations are not substantiated, alternative work arrangements may be considered.
- Arrange alternative work arrangements for the complainant or accused if the allegations are not substantiated.
- Take appropriate action such as counselling or be subjected to disciplinary action in response to reported allegations.
- Where it is found that an employee has been harassed, bullied, or victimised in the workplace the employee's employment status will not be disadvantaged in any way.
- Ensure that complainants are given as much protection and confidentiality as practically possible.
- Ensure that any victims of bullying and or harassment are provided with the appropriate treatment for the benefit of the victims' physical or mental health.

# Harrassment & Bullying Policy

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## We Will Continued...

- Ensure that we undertake reasonable management action.
- Use findings and any recommendations to determine the appropriate course of action to take.
- Educate our employees about the external avenues that can be used if they are not satisfied with the resolution provided internally.
- Put a system in place which promotes early identification of bullying and harassment.
- Implement appropriate control measures to manage the risks of bullying and harassment and also ensure that we monitor and review the effectiveness of the control measures.
- Allocate sufficient resources to meet the commitments of this 'Policy'.
- Display this 'Policy' statement throughout our offices and facilities and communicate to all our employees and interested parties as part of inductions and training.
- Review the 'Policy' for continuing suitability and relevance on an annual basis as part of corporate management reviews.



# Drug & Alcohol Management Policy

The Kypreos Group of Companies (the Group) has established this 'Policy' in recognition and endorsement of its commitment to providing a safe workplace environment at all our work sites throughout the various Australian states and territories.

## What does it mean

Drug and alcohol use can affect a person's ability to work safely. It creates a risk to the health and safety of workers.

Each person must ensure that they are not influenced by the consumption of drugs or alcohol, in such a condition as to endanger their own safety or others at this workplace.

The health, safety and wellbeing of our employees, suppliers, workplace operatives and members of public, are of key importance in order to create a safe and productive workplace.

## Our Objectives

- Apply the 'Policy' to all employees without exception.
- To achieve compliance with legislative and regulatory requirements for the provision of a safe working environment for the Groups' workers, invitees, and the community.
- The Group will comply with the relevant legislative and regulatory requirements while implementing any testing regime.

## We Will

- Educate our workers that the consumption of drugs or alcohol, be it for medicinal, recreational, or occupational use, can lead to major deficiencies in work performance and is a contributing factor in workplace incidents.
- Take all reasonable steps to assess and control workplace hazards which might lead to an unsafe workplace due to drug and alcohol misuse.
- Provide assistance to workers to overcome problems associated with misuse of drugs and alcohol.
- Identify alcohol and drug related risks and implement procedures to identify, test, report, support, and manage any risks or usage.
- Provide appropriate support to our workers who may be at risk of drug or alcohol misuse through education and training.
- Only use disciplinary action as the last resort.
- Maintain confidentiality and respect for privacy in accordance with legislative and regulatory requirements.
- Require Senior management to review and revise the 'Policy', procedures and plans if not more than 2 years to ensure and maintain their relevance and effectiveness.
- Create a safe and open environment where workers who feel they are developing or already have a problem with drug or alcohol consumption are encouraged to report their concerns to the Group.
- Display this 'Policy' statement throughout our offices and facilities and communicate to all our employees and interested parties as part of inductions and training.

# Young Persons at Work Policy

The Kypreos Group of Companies (the Group) are committed to supporting young persons within the workplace by providing a healthy and safe work environment. The Group is proactive in promoting and support the needs of young people at work as we recognise and understand that they require additional support and guidance.

## What does it mean

The Group expects all who have, or seek to have, a business relationship with the Group entities to familiarise themselves with this policy and to act in a way that is consistent with its values.

Young persons (13-24) may include those in the workplace that are undertaking an apprenticeship, traineeship, or work placement as a course requirement in addition to general employment.

When undertaking any of these, it is understood that young persons have not acquired the necessary skills required to fulfill industry or job specific tasks or roles. Therefore, suitable, and careful consideration, guidance and support should be given to all young persons in the workplace to ensure their safety, health and productivity.

## Our Objectives

- Create awareness, increase knowledge, skills, and capability in identifying and managing risks associated with young persons in the workplace.
- Protect young persons against any hazards which may impact their health, safety, and productivity in the workplace.
- Preserve and uphold young person's right to a safe work environment.

## We Will

- Promote and foster a youth- friendly culture by encouraging young person inclusion.
- Ensure that we inform and educate young persons about their rights and responsibilities.
- Consult with young persons on work health and safety matters and ensure they know how and are comfortable with reporting incidents and hazards.
- Be proactive in ensuring that our managers implement a risk management system which appropriately identifies, assesses, and adequately controls risks.
- Perform periodic reviews on young persons involvement in activities.
- Ensure that adequate instruction and supervision is given to young persons so they can work safely.
- Conduct safety inspections and walk throughs with young persons so they can practice their skills in identifying hazards and unsafe work practices.
- Provide appropriate avenues for redress that are approachable and reasonable.
- Comply with all legislative and regulatory requirements to achieve the objectives set out in this policy.
- Allocate sufficient resources to meet the commitments of this 'Policy'.
- Display this 'Policy' statement throughout our offices and facilities and communicate to all our employees and interested parties as part of inductions and training.

# Young Persons at Work Policy

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## We Will Continued...

- Review the 'Policy' for continuing suitability and relevance on an annual basis as part of corporate management reviews.

# Social Media Policy

The Kypreos Group (the Group) believe the way we communicate and the way we talk and portray ourselves through words and images impacts how people see us and how much they trust us.

## What does it mean

This policy has been developed to provide employees with an understanding of the Groups' expectations when they engage in conversations or interactions through social media (electronic and online) for official, professional and personal use.

Employees should be aware that published online and on social media is, or may become publicly available, even from personal social media accounts.

Content published on the internet can remain available publicly indefinitely. Content can also be replicated and shared beyond the original intended audience who may view it out of context or use it for an unintended purpose. For example, private messages or posts can be saved, screenshot, and made public – with little potential for recourse.

All employees, and persons who work with the Kypreos Group of Companies, have a personal responsibility for implementing this Policy.

We expect you to take reasonable steps to ensure that any social media use or public comment you make, including online, falls within the following parameters.

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## Our Objectives

- Provide guidance and protection to employees to help them avoid being misrepresented in the media and to preserve the reputation of the Group.

## We Will

- Only disclose and discuss publicly available information, not confidential information obtained in their capacity as an employee of Kypreos Group of Companies
- Act with the best intentions and not post any information, comments or material that may damage Kypreos Group's reputation, commercial interests or bring Kypreos companies into disrepute; and
- Use a disclaimer when discussing Kypreos companies or Kypreos-related matters i.e. "The postings on this site are my own and do not represent the position, strategy or opinions of the Kypreos Group."
- Consider perception (how might people reasonably interpret their actions), especially in relation to conflict-of-interest considerations.
- Educate our employees about their interactions with colleagues on social media and how they should consider the potential impacts of such interactions.
- Require any misuse of social media should to be reported to management so appropriate action can be taken.
- Not permit the use of work email address to register personal social media accounts.
- Prohibit comments that are unlawful, obscene, defamatory, threatening, harassing, discriminatory or hateful to or about work, colleagues, peers, clients, or customers.



# Social Media Policy

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## We Will Continued...

- Prohibit employees to express personal views in person or on social media in such a way that could inaccurately be interpreted as the company's views.
- Not allow employees to respond to the media, regulators, government officials or any other external broadcast channel without prior authorisation from relevant senior management.
- Respond to any breaches of this policy with the appropriate disciplinary action including dismissal and any staff members suspected of committing breaches will be required to cooperate with the investigation.
- Require employees to remove any social media content that we consider to constitute a breach of this policy. Failure to comply with such a request may result in disciplinary action.
- Prohibit employees to write or say anything which may negatively impact our clients.

# Equal Employment Opportunity (EEO) Policy

Kypreos Group of Companies (the Group) will not undertake or condone discrimination on the basis of race, sex, national origin, age, or disability within the Kypreos Group of Companies (the Group), its supply chains or through any other business relationship.

## What does it mean

The Group will Positively seek to identify and eliminate all discriminatory practices both direct and indirect and strive to maintain a workplace free of discrimination.

The Group expects all who have, or seek to have, a business relationship with the Group entities to familiarise themselves with this policy and to act in a way that is consistent with its values.

## Our Objectives

- Demonstrate management and staff commitment to the principles of Equal Employment Opportunity (EEO).
- Ensure that the process of the EEO and their application is communicated affectively to employees, target groups and the public
- Provide equal access to promotion, training, transfers, and benefits of employment on the basis of merit.

## We Will

- Ensure that all employees are aware that the Group considers paramount the legal and moral responsibility to treat each other fairly and that all employees are expected to fulfil these responsibilities as a condition of employment.
- Ensure that any Employee who believes he or she has been or is being subjected to discrimination will bring this matter to the attention of his or her immediate supervisor, department head or the Human Resources department.
- Require managers to report complaints immediately to the Human Resources department.
- Ensure that everyone is assessed based on their skill, qualification, work experience, abilities, prior work experience and aptitude.
- Educate everyone within the workplace of their rights and responsibilities under the relevant legislative and regulatory requirements.
- Ensure that Senior Management treat reports of discrimination complaints seriously, sympathetically, and confidentially and will investigate these thoroughly.
- The privacy of the persons involved will be protected, except to the extent necessary to conduct a proper investigation.
- Ensure that established breaches of the 'Policy' will be met with immediate corrective action designed to stop the discrimination and prevent its reoccurrence.

# Equal Employment Opportunity (EEO) Policy

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## We Will Continued...

- Allocate sufficient resources to meet the commitments of this 'Policy'
- Display this 'Policy' statement throughout our offices and facilities and communicate to all our employees and interested parties as part of inductions and training.
- Review the 'Policy' for continuing suitability and relevance on an annual basis as part of corporate management reviews

# Indigenous Participation Policy

The Kypreos Group of Companies (the Group) seek to develop corporate and workplace specific Indigenous Participation Plans that comply with the Australian State and Territories Government requirements and guidelines.

## What does it mean

The Kypreos Group are committed to equal employment opportunities and workforce diversity without prejudice to race.

## Our Objectives

- Increase the participation rate and employment outcomes of Indigenous Australians across all our workplaces to at least reflect participation levels in society.
- Develop leading strategies and contribute to shaping the national agenda in Indigenous employment and engagement.
- Redress, through affirmative action in employment, the past disadvantages experienced by Indigenous Australians.
- Create a work environment that is free from discrimination, promotes an understanding of Indigenous culture, and is culturally respectful and inclusive.
- Build and develop a positive working relationship with the community and relevant stakeholders with the object of improving employment outcomes for Indigenous Australians.

## We Will

- Provide an environment where Indigenous employees are encouraged to achieve their full potential.
- Celebrate the knowledge, skills and history of Indigenous Australians and recognise the cultural diversity this knowledge brings to the workplace.
- Provide a workplace where cultural, social, and religious systems practiced by Indigenous Australians are respected.
- Positively and proactively seek to recruit Indigenous Australians, where appropriate.
- Offer career development programs such as training, education, mentoring and other learning initiatives to build individual skills and leadership capacity. These programs will assist in retaining Indigenous Australians at our workplaces.
- Work with external partners and indigenous employment agencies to develop traineeships, apprenticeships, and support for work placements.
- Review Indigenous participation scheduled activities and strategies as part of regular management meetings.
- Require the Business Systems Manager to review Indigenous Participation Plans on a regular basis through internal audits and will also be held responsible for initiating corrective actions.
- Allocate sufficient resources to meet the commitments of this 'Policy'.
- Display copies of the 'Policy' throughout our offices and facilities in order to promote its importance.
- Contractors and Sub-contractors Indigenous Participation policies will be assessed as part of their tender and evaluated during the course of the contract.



# Training Management Policy

The Kypreos Group of Companies (the Group) recognises the benefit of pursuing a collaborative approach across its contracts and the importance of training and developing its staff and understands that its employees are key to its success.

## What does it mean

The Group encourages its employees to be continually improving their skills and abilities both through on-the-job and off-the-job training.

The Group acknowledges that training and development of staff provides benefits both to its employees in terms of their overall career as well as being central to the success as a business.

This is achieved through successful implementation of a partnering relationship strategy thereby improving communication and the Groups' relationships with its internal and external stakeholders.

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## Our Objectives

- Develop a corporate and workplace specific training plan that complies with the various State and Territory Government requirements and guidelines.
- Encourage our contractors and subcontractors to participate in training and skills development opportunities.

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## We Will

- Discuss with the workers consultative committee or representative's workplace specific training needs.
- Review employee training needs as an agenda item in regular corporate and workplace management meetings.
- Provide adequate resources throughout our workplaces for the implementation of training plans.
- review, monitor and evaluate workers training status, and the achievement of targets and outcomes by conducting audits, reports, and training evaluations.
- Assess contractors and subcontractors training management as part of their tender process and monitor during the course of engagement for compliance.
- This 'Policy' statement will be displayed throughout our offices and facilities and communicated to all our employees and interested parties as part of inductions and training.
- Review the 'Policy' for continuing suitability and relevance on an annual basis as part of corporate management reviews.

# Company Motor Vehicle Policy

The Kypreos Group of Companies (the Group) provide some of its workers with company owned and maintained motor vehicles. The Groups assets are to be well respected and maintained at all times.

## What does it mean

The group expects all who have or seek to have a business relationship with the Group entities to familiarise themselves with this policy and to act in a way that is consistent with its values.

All persons who are eligible for a company vehicle to perform duties within the scope of their work must meet all the requirements prior to receiving a company vehicle.

All persons who receive a company vehicle are aware, understand and comply with their responsibilities and obligations while using a company owned vehicle.

## Our Objectives

- Provide guidelines for those workers issued with a company owned vehicle the requirements of the Group in relation to those vehicles.
- Ensure that workers who are issued with a company vehicle understand the guiding principles associated with its use.
- Ensure that the Groups company owned vehicle is well respected and maintained at all times.
- Monitor persons to ensure compliance to the Act

## We Will

- Ensure that there are procedures that address – issuing a company vehicle, insurance and accidents, damage, e-tags and fuel cards, maintenance, roadside assistance, registration, infringements, representing the Group in a company owned vehicle and forms and documentation.
- Ensure that the Board or delegated Senior manager authorize the issue of a company vehicle to a worker.
- Require the general manager of Kypster to undertake reviews and document vehicle condition reports.
- Perform vehicle and service maintenance and conduct vehicle inspection reports.
- Require workers to treat company owned vehicles with respect at all times and follow all company owned vehicle procedures.
- Take appropriate disciplinary action against anyone who breaches this policy through further training, suspension (including suspension without payment), verbal or written warnings or termination of employment.
- Allocate sufficient resources to meet the commitments of this 'Policy'.
- Display This 'Policy' statement throughout our offices and facilities and communicated to all our employees as part of inductions and training.
- Review the 'Policy' for continuing suitability and relevance on an annual basis as part of corporate management reviews.

# Company Motor Vehicle Policy

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## Workers

- Treat company care with respect at all times
- Complete the relevant vehicle forms as required.
- Track their vehicles service history and ensure the vehicle is presented for servicing when due.
- Ensure the company vehicle is always road worthy.
- Always maintain a current driver's licence and advise their direct manager immediately if that licence is suspended by the authority.
- Abide by this policy at all times.

# Industrial Relations Policy

The Kypreos Group of Companies (the Group) are committed to an engagement in processes and activities that improve our industrial relations performance. With that commitment, is an acknowledgement that the effective management of industrial relations is key in achieving cost efficient and timely completion of contracts and the wellbeing of stakeholders involved.

## What does it mean

The Group expects all who have, or seek to have, a business relationship with the Group entities, to familiarise themselves with this policy and to act in a way that is consistent with its values. The Group will comply in accordance with the relevant legislative, regulatory, and Building codes.

The Board will have the ultimate responsibility for industrial relations throughout the Group and will delegate responsibilities to General Managers when it is practicable to do so.

## Our Objectives

- Provide mechanisms and processes to support adherence to relevant industrial relations requirements and the implementation of workplace relations management principals

## We Will

- Comply with our legal and contractual obligations for industrial relations.
- Ensure all employees receive their legal and statutory entitlements in full.
- Provide a safe workplace for all employees, by providing safety clothes and equipment where required.
- Maintain open and meaningful communications between with clients, employees, management, and unions at all times.
- Ensure that in our Negotiating, and implementation of the provisions of our Enterprise Agreements comply with the applicable legislation.
- Encourage all employees to foster harmonious relations through mutual respect and acknowledgement of common goals.
- Provide up to date advice and assistance to our employees regarding industrial relation entitlements.
- Provide leadership to the construction industry employer associations to ensure satisfactory outcomes for all industry stakeholders.
- Review the 'Policy' for continuing suitability and relevance on an annual basis as part of corporate management reviews



# Information Technology (IT) Policy

The Kypreos Group of Companies (the Group) seek to provide its employees and contractors with secure and timely access to Information Technology (IT) equipment and the online services and resources necessary for undertaking their work tasks. The Group is highly reliant on information that is gathered, stored, processed, and delivered by computers and their associated communications facilities.

## What does it mean

The purpose of this 'Policy' is to give a clear statement to all users of the Group IT facilities and services of their responsibilities, including what constitutes acceptable and unacceptable use; to manage the provision and modification of access to online services and to express the commitment of the Group to providing and maintaining a secure, effective, and reliable IT infrastructure to support its operations.

This 'Policy' applies to all users of the Group IT facilities and services.

## Our Objectives

- To make employees aware of their rights and responsibilities in respect of their use of Group IT facilities and the consequences of breaching this 'Policy'.
- Comply with applicable laws and regulations.
- To foster an environment where everyone is respectful toward others and their privacy.
- Not adversely affect the Groups commercial interests
- Do not bring the Group into disrepute.

## We Will

- Provide IT facilities and services for administrative, commercial, and business activities of the Group.
- Permit some reasonable non-commercial personal use and regard this as a privilege, not a right.
- Prohibit anyone to use an IT facility or service to create, access, transmit or otherwise deal with content in a way that is illegal, or may result in any legal action or may be reasonably regarded as objectionable, defamatory, or offensive.
- Prohibit any breaches of intellectual property resulting from reproducing, distributing, or otherwise dealing with copyright material or other intellectual property outside of accepted use.
- Prohibit any unauthorised access to data or to use the Group's IT facilities to interfere with internal or external computers or networks including excessive non-work-related use of the internet.
- Respect personal privacy of others including all users of the Group's IT facilities.
- Address minor breaches of this Policy by sending an email to the user notifying them of the breach and requesting them to refrain from engaging in the activities which lead to the breach.
- Respond to ongoing or serious breaches of this Policy by applying appropriate disciplinary procedures, which may include termination of employment.

# Information Technology (IT) Policy

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## We Will Continued...

- Comply with any legislative or regulatory requirements that oblige us to report any offences under state or commonwealth law.
- Prohibit breaches of software licencing agreements
- Allocate sufficient resources to meet the commitments of this 'Policy'.
- Display this 'Policy' statement throughout our offices and facilities and communicate to all out employees and interested parties as part of induction and training.
- The 'Policy' and associated procedures will be reviewed for continuing suitability and relevance on an annual basis as part of corporate management review processes.

# Bribery & Corruption Policy

The Kypreos Group of Companies (the Group) does not offer or accept bribes or engage in any form of corruption, whether directly within the Kypreos Group of Companies (the Group), our supply chains or through any other business relationship. This policy applies to all persons working for or on behalf of the Group, in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative.

## What does it mean

The Group expects all who have, or seek to have, a business relationship with the Group entities to familiarise themselves with this policy and to act in a way that is consistent with its values.

The Group will not abuse a position of power or responsibility for profit, nor provide or accept anything of value (financial or otherwise) in order to improperly influence or reward any action or inaction of any person in the performance of their duties.

## Our Objectives

- To be guided by a high ethical standard by acting honestly and with transparency in all company dealings and operations.
- For all responsible persons to act professionally, fairly and with integrity.
- To prevent and manage any actual or potential risks of bribery, fraud, or conflicts of interests.

## We Will

- Identify parts of the business and supply chains which are most at risk from bribery and corruption so efforts can be focused on the areas that are most 'at risk'
- Ensure that all directors are aware of their obligations to disclose any conflicts of interest and assist in fulfilling such obligations.
- Where appropriate, as provided by the risk assessment, the Group will communicate clearly to all relevant parties, the measures in place to ensure that bribery and corruption is **not occurring**.
- Use company funds and resources for lawful, ethical and proper purposes only.
- Provide comprehensive clear guidelines for all our employees and all third parties that offering or paying any kind of bribe on behalf of the Group is completely unacceptable.
- Monitor our Group Entities, subcontractors, and suppliers to ensure compliance to the policy.
- Provide avenues for reporting of any corruption or attempts at bribery or any potential or actual conflicts of interest.
- Never make or accept any improper payments to obtain, retain or improve business or influence persons in the performance of their duties.
- Make provision for our contracted suppliers to hold their own suppliers accountable for all legal requirements. We also reserve the right to terminate any contractual arrangement if there is breach of this policy.

# Bribery & Corruption Policy

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## We Will Continued...

- Allocate sufficient resources to meet the commitments of this 'Policy'.
- Display this 'Policy' statement throughout our offices and facilities and communicate to all our employees and interested parties as part of inductions and training.
- Review the 'Policy' for continuing suitability and relevance on an annual basis as part of corporate management reviews.



# Fraud, Deception & Dishonesty Policy

The Kypreos Group of Companies (the Group) not knowingly engage in, condone, or ignore any kind of fraud, false claim, deception or dishonest behaviour or allow someone else to do so on behalf of the Kypreos Group of Companies (the Group), or through any other business relationship.

## What does it mean

The Group will not obtain an advantage (financial or otherwise) or cause someone a loss through the use of deliberate deception. Making a false claim using or diverting the company's money or resources for improper purposes are examples of fraud within the workplace.

The Group expects all who have, or seek to have, a business relationship with the Group entities to familiarise themselves with this policy and to act in a way that is consistent with its values.

## Our Objectives

- Acting honestly and with transparency in all company dealings and operations.
- Provide comprehensive clear guidelines for all our employees in accurate recording of expenses, materials and services provided.
- For all responsible persons to act professionally, fairly and with integrity.

## We Will

- Determine which parts of the business are most at risk from fraud so efforts can be focused on the areas that are most 'at risk'.
- Where appropriate, as informed by the risk assessment, the Group will communicate clearly to all relevant party's measures in place to ensure that fraud and deception is not occurring.
- Ensure our financial records are accurate, complete, not misleading and comply with our contractual obligations and all relevant legislative and regulatory requirements.
- Ensure our financial records comply with all legislative and regulatory requirements.
- Provide avenues for reporting of any actual and/or attempted fraudulent or deceptive behaviour.
- Never make a false claim by knowingly misrepresenting or inaccurately recording time spent or materials or services provided.
- Make provision for our contracted suppliers to hold their own suppliers to the same standards. We also reserve the right to terminate any contractual arrangement if there is breach of this policy.
- Allocate sufficient resources to meet the commitments of this 'Policy'.
- Display this 'Policy' statement throughout our offices and facilities and communicate to all our employees and interested parties as part of inductions and training.
- Review the 'Policy' for continuing suitability and relevance on an annual basis as part of corporate management reviews.

# Anti-Slavery Policy

The Kypreos Group of Companies (the Group) is committed to preventing and addressing the risk of modern slavery occurring within its own businesses or its supply chains. This policy applies to all persons working for or on behalf of the Group, in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative.

## What does it mean

The Group will only do business with organisations who fully comply with this policy, or those who are taking verifiable steps towards compliance with the Modern Slavery Act 2018 (Cth).

The Group expects all who have, or seek to have, a business relationship with the Group entities to familiarise themselves with this policy and to act in a way that is consistent with its values.

## Our Objectives

- Provide and maintain a Modern Slavery Risk Management System for group businesses, which achieves the requirements of the Act
- Provide comprehensive clear guidelines for all our employees, so that they can comply with their legal responsibilities for the prevention and addressing of modern slavery risks within its operation and supply chain.
- Monitor our Group Entities, subcontractors, and suppliers to ensure compliance to the Act.

## We Will

- Conduct risk assessments to determine which parts of the business and which supply chains are most at risk from modern slavery so efforts can be focused on the areas that are most 'at risk'.
- Conduct due diligence on modern slavery risks by engaging directly with new suppliers in order to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses.
- Ensure that our contractual documentation incorporates specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour, and the use of child labour in line with this policy and legal requirements.
- Make provision for our contracted suppliers to hold their own suppliers accountable for all legal requirements. We also reserve the right to terminate any contractual arrangement if there is breach of this policy.
- Allocate sufficient resources to meet the commitments of this 'Policy'.
- Display this 'Policy' statement throughout our offices and facilities and communicate to all our employees and interested parties as part of inductions and training.
- Review the 'Policy' for continuing suitability and relevance on an annual basis as part of corporate management reviews.