

MIRVAC HEALTH, SAFETY & ENVIRONMENT MANAGEMENT SYSTEM

Document Authorised by: HSE&S Committee

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MIRVAC HEALTH, SAFETY & ENVIRONMENT MANAGEMENT SYSTEM

Introduction

Mirvac's health, safety and the environment (HSE) vision is to continue to pursue safety excellence whilst improving the overall health and wellbeing of our workers and communities. Our aim is to be recognised as the safest and healthiest organisation in the industries in which we operate.

The Mirvac HSE Management System (System) establishes the minimum requirements and standards for managing HSE. The System has been adopted by, and will be applied consistently across, all Mirvac operating entities. The System is intended to be simple and effective.

The System prescribes detailed minimum requirements for the management of our critical risks, known as the Mirvac Minimum Requirements (MMRs). Otherwise, wherever appropriate, the System moves away from prescribing controls for every activity, hazard and risk. Instead, all people are empowered to take a comprehensive risk based approach (using the tools in the System) to addressing the HSE risks which arise in the often dynamic environments in which we operate. People are also encouraged to go beyond the minimum requirements and standards wherever possible.

The System is underpinned by an appreciation that management of HSE is everyone's responsibility. HSE is integral to decision making throughout the entire life-cycle from investment, planning, design, construction and management of our assets.

FRAMEWORK

This System framework comprises 12 elements, being:

1. Leadership & Culture;
2. Performance, Planning and Targets;
3. Risk Management (including Critical Risk Management);
4. Health & Wellbeing;
5. Incident Management;
6. Environmental Management;
7. Consultation, Coordination & Co-Operation;
8. Competency & Capability;
9. Legal & Compliance;
10. Service Providers & Supply Chain;
11. Management of Change; and
12. Monitoring, Audit & Continuous Improvement.

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ELEMENT 1 - LEADERSHIP & CULTURE

Purpose

Mirvac executives and senior managers are to demonstrate active commitment to our HSE vision by exhibiting leadership and promoting a positive HSE culture.

SYSTEM REQUIREMENT

The frequency and nature of HSE leadership engagement activities will differ according to the person's role and the expectations of the Mirvac operating entity.

The required number of HSE leadership engagement activities for the Executive Leadership Team and Management Leadership Team are set on an annual basis in accordance with Element 2 – Performance, Planning and Targets.

The ELT and MLT are encouraged to participate in activities that are not typically part of their daily activities or existing responsibilities. Examples of actions include:

- visiting a Mirvac site to review work activities (focusing on critical risks);
- participating in a DOOR review;
- participating in an investigation or review of an incident (conducted in accordance with Element 5 – Incident Management);
- attending an industry forum or continuing education session on a HSE topic;
- attending an in-house HSE awareness training/seminar; or
- participating and assisting the floor warden to clear the floor of personnel during evacuation exercises.

As a minimum each ELT and MLT member must participate in a DOOR Review and attend a site to discuss work, health & safety issues with workers (focusing on critical risks). In relation to any attendance at a site the **Executive HSE Actions – Inspection Worksheet** must be completed. The leadership engagement activities for the Executive Leadership Team and Management Leadership Team will be tracked and recorded in the **ELT actions sheet** and **MLT actions sheet** respectively.

Each Business Unit will develop, and implement, a regime of required HSE leadership engagement activities for the senior managers within the Business Unit who are not part of the ELT or MLT.

Key links

- [ELT actions sheet](#)
- [MLT actions sheet](#)
- [Executive HSE Actions – Inspection Worksheet](#)

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ELEMENT 2 - PERFORMANCE, PLANNING AND TARGETS

Purpose

HSE objectives and targets are to be established as part of the overall business strategy and are aimed at driving continuous improvement in HSE performance. Clear plans for how these targets will be achieved must be developed and implemented.

SYSTEM REQUIREMENT

The Mirvac enterprise HSE objectives and targets include a series of lead and lag indicators aimed at improving HSE performance. These objectives and targets are set out in the **HSE Scorecard** which is reviewed annually and endorsed by the HSE&S Committee.

Progress against each target is measured and reported to the HSE&S Committee, the Executive Leadership Team and the Mirvac Board (as part of its corporate disclosure obligations) at quarterly intervals, or more regularly where required.

All Mirvac operating entities will document their own objectives and targets which are consistent with the Mirvac enterprise **HSE Scorecard**. Additional targets which address the specific risk profile and associated HSE issues of the operating entity must also be set, effectively monitored and reported.

The Mirvac enterprise objectives and targets are achieved through implementation of this system as well as ARM, being the Mirvac enterprise risk management system. ARM is monitored and updated at least annually.

Each Business Unit may choose to have in place a management system manual specific to their business. The Business Unit management system manual must comply with requirements of this Mirvac enterprise HSE Management System and set out in greater detail how HSE related issues are addressed by the Business Unit.

All workplaces must prepare and adhere to a Workplace Risk Management Plan (WRMP). The WRMP includes a Risk & Opportunity Register which identifies controls for significant HSE risks. The WRMP implemented by each operating entity will be consistent with the Mirvac WRMP template, tailored to respond to the specific HSE related issues of the operating entity at the workplace.

Key links

- [HSE Scorecard](#)
- ARM (to be accessed via My Workspace)

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ELEMENT 3 - RISK MANAGEMENT

Purpose

All HSE related hazards and risks must be identified and understood. Processes and procedures must be in place to effectively manage those risks throughout the entire life-cycle from investment, planning, design, demolition, construction and management of our assets.

SYSTEM REQUIREMENT

Mirvac's key HSE risks and the effectiveness of associated controls are documented and monitored within ARM, being the Mirvac enterprise risk management system. ARM is monitored and updated at least annually. Each operating entity must have processes and procedures (set out in its management system manual or elsewhere) in place for regularly assessing all HSE related risks i.e. for determining its 'risk picture.'

Specific requirements in relation to Risk Management are prescribed for the following phases:

- Design: all Mirvac operating entities must manage the design process in accordance with the **DOOR Procedure** and associated Safety in Design

documents and resources. The purpose of Safety in Design is to ensure, so far as is reasonably practicable, the health and safety of all persons involved in, or who are affected by, the undertaking of any works. Hazards and risks are to be eliminated or minimised so far as is reasonably practicable throughout the design process. Good design work can also optimise HSE, human performance, job satisfaction and business success generally;

- **Critical Risks Management:** the System prescribes detailed requirements for the management of our critical risks, known as the Mirvac Minimum Requirements (MMRs). Whenever a Mirvac operating entity has management and control of a workplace, the critical risks must be managed in accordance with the Critical Risk Management Sub-Element, including the MRRs. The MMRs are structured around our Critical Focus Areas (CFAs), being those high-risk activities most relevant to our operations.
- Workplaces: all workplaces must prepare and adhere to a Workplace Risk Management Plan (WRMP). The WRMP includes a Risk & Opportunity Register which identifies controls for significant HSE risks. The WRMP implemented by each operating entity will be consistent with the Mirvac WRMP, and tailored to respond to the specific HSE related issues of the operating entity.

In all other instances, Mirvac personnel and Service Providers are empowered to take a comprehensive risk based approach to addressing the HSE risks which arise in the often-dynamic environments in which we operate. People are also encouraged to go beyond the minimum requirements and standards wherever possible. Hazard identification, risk assessment and implementation of controls at Mirvac workplaces must be undertaken in accordance with the HSE Risk Management Procedure. Persons undertaking hazard identification and risk assessments will be competent and trained in the **HSE Risk Management Procedure**.

Key links

- ARM (to be accessed via My Workspace)
- HSE Risk Management Procedure
- Critical Risk Management
- DOOR Procedure
- Mirvac SWMS JSEA Template

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ELEMENT 4 - HEALTH & WELLBEING

Purpose

Mirvac is committed to providing safe, healthy and productive workplaces. This means all persons attending a Mirvac workplace must do so in a fit state. Additionally, Mirvac will put in place measures aimed at enhancing the health & wellbeing of our people.

SYSTEM REQUIREMENT

All workers attending Mirvac workplaces must do so in a fit state to undertake their required tasks to ensure their own safety as well as that of other workers and visitors. Workers must not be impaired by pre-existing conditions, drug and alcohol use, fatigue or any other health and wellbeing factors. **The Alcohol & Other Drugs Policy** must be adhered to. Additionally, when Mirvac has management and control of a construction project, where safety critical roles are being undertaken, monitoring activities which may include testing must be implemented in accordance with the **Fitness for Work Mirvac Minimum Requirement**.

Mirvac aims to improve the overall health and wellbeing of our employees and communities. We want to be recognised as the healthiest organisation in the industries in which we operate. Mirvac will put in place measures to encourage our people to be more active, eat healthier food and get a good night sleep. These measures, which can be accessed on the **Health & Wellbeing Resources** page, seek to create a happier, healthier and more productive workforce.

Key links

- [Alcohol & Other Drugs Policy](#)
- [Health & Wellbeing Resources](#)
- [Fitness for Work Mirvac Minimum Requirement](#)

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ELEMENT 5 - INCIDENT MANAGEMENT

Purpose

HSE incidents, near misses and emergencies are to be communicated, reported, investigated and analysed. Appropriate corrective actions are to be implemented and learnings shared.

SYSTEM REQUIREMENT

All HSE incidents and near misses are reported, recorded and investigated in accordance with the **Incident Management Procedure**. Evaluation of corrective actions arising from incident / near miss trends are to be undertaken by the HSE&S Committee and the relevant Business Unit. Any learnings from such evaluations are to be shared with relevant Mirvac personnel and stakeholders.

The National HSE Manager, in consultation with their Business Unit, will determine when a HSE Alert is to be issued. The Group Safety Manager will maintain a schedule of all issued HSE Alerts and make those available to all relevant stakeholders.

Communication and management of all Critical Incidents must be undertaken in accordance with the **Mirvac Crisis & Incident Management Plan**, the **Mirvac Crisis & Incident Management Plan Quick Reference** and, where relevant, statutory requirements. Any correctives actions arising from a Critical Incident must be reviewed as part of an Incident Review Board and communicated to the HSE&S Committee. Critical Incidents are those incidents and near misses which result in, or have the potential to result in a fatality or a permanent disabling injury. These are incidents identified as Amber or Red incidents in the **Mirvac Crisis & Incident Management Plan Quick Reference** and a 'Level 4' safety incident or near miss in iSystain (to be accessed via My Workspace)

Whenever Mirvac personnel suffer injury or harm they will be managed in accordance with the **Injury Management and Return to Work Manual**.

Mirvac will ensure processes are in place to prepare for and respond to emergencies at all workplaces in accordance with the minimum requirements set out in the **Emergency Response Plan**.

Key links

- [Mirvac Crisis & Incident Management Plan](#)
- [Mirvac Crisis & Incident Management Plan Quick Reference](#)
- [Incident Management Procedure](#)
- [Injury Management and Return to Work Manual](#)
- [Emergency Response Plan](#)
- iSystain (to be accessed via My Workspace)
- [HSE Alert Template](#)

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ELEMENT 6 - ENVIRONMENTAL MANAGEMENT

Purpose

Mirvac is committed to protecting the environment and a realising a sustainable future by the implementation of our strategy *This Changes Everything*.

Measures must be in place to identify and avoid, or minimise, any harm to the environment arising from Mirvac's operations.

SYSTEM REQUIREMENT

Mirvac personnel and Service Providers must take all reasonable steps to avoid any adverse impact to the environment when undertaking works. Additionally, whenever a Mirvac operating entity has management or control of a workplace, all environmental aspects and impacts must be identified and managed in accordance with the **Environmental Management Mirvac Minimum Requirement**.

Additional environmental matters specific to a workplace, such as the need to monitor the key characteristics of operation that have the potential to cause a significant impact on the environment, will be identified and managed in accordance with the Workplace Risk Management Plan.

Any adverse impact on the environment arising from our operations is to be reported and managed in accordance with our legal obligations as well as Element 5 – Incident Management.

Mirvac's commitment to sustainability is outlined within our strategy **This Changes Everything**. All Mirvac personnel and Service Providers must provide all reasonable assistance to enable Mirvac to achieve the goals set out in **This Changes Everything**.

Key links

- [This Changes Everything](#)
- [Environmental Management MMR](#)

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ELEMENT 7 - CONSULTATION, CO-OPERATION & CO-ORDINATION

Purpose

Effective consultation, co-operation and co-ordination (CCC) with persons involved in, or affected by, the undertaking of works must occur. CCC must also occur with Service Providers and all other interested parties.

Consultation can promote the sharing of relevant information in an open, transparent manner and provide opportunities for workers to express their views, raise issues and contribute to decision making wherever possible.

SYSTEM REQUIREMENT

The purpose of effective CCC is to ensure, so far as is reasonably practicable, the health and safety of all persons involved in, or who are affected by, the undertaking of any works but also to achieve optimal project outcomes.

CCC at Mirvac occurs in various forms including training implemented in accordance with Element 8 – Competency & Capability, communication of planned and unplanned changes in accordance with Element 11 – Management of Change, sharing of information and learnings in accordance with Element 5 – Incident Management as well as management of the design process in accordance with the **DOOR Procedure**. Each operating entity may choose to have in place additional CCC provisions which will be contained in the management system manual specific to their operations.

CCC at a Mirvac workplace must be undertaken generally in accordance with the **Consultation, Co-operation and Co-ordination Procedure**, the Workplace Risk Management Plan (WRMP) and in accordance with all relevant legislation. The WRMP must clearly provide for CCC with Mirvac personnel as well as with Service Providers and all other interested parties.

Key links

- [Consultation, Co-operation and Co-ordination Procedure](#)
- [DOOR Procedure](#)

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ELEMENT 8 - COMPETENCY & CAPABILITY

Purpose

Mirvac personnel will receive training to make them aware of, and to enable them to satisfy, their HSE obligations.

Additionally, processes must be in place to ensure all Mirvac personnel, as well as Service Providers, undertaking works are competent to do so and always exhibit the four safety behaviours in Mirvac's safety culture program, Work Safe, Stay Safe.

SYSTEM REQUIREMENT

HSE training requirements across Mirvac are set out in the **Mirvac Training Schedule**. This identifies the minimum training requirements for all Mirvac employees as well as the training requirements for directors and officers. The Mirvac Training Schedule will be maintained by the Group Safety Manager, and attendance in accordance with the Schedule will be monitored through Lean Connect.

Additionally, each Business Unit will develop and implement a HSE related training schedule (i.e. a training needs analysis) which is relevant to their operations. As a minimum this must address specific training for senior managers, workplace managers and supervisory staff in their WHS obligations and the most relevant aspects of the System to their role.

The Business Unit training schedules will be maintained by the National HSE Manager. All Training Schedules will be reviewed no less than every 3 years.

All Mirvac personnel and Service Providers carrying out work at a workplace are made aware of, and inducted into, the relevant HSE issues identified in the Risk & Opportunity Register (which is attached to the WRMP) prior to commencing work. Refresher inductions will occur when it is deemed appropriate by the relevant National HSE Manager, or other appropriate person, based on the risks at the workplace and consultation with Mirvac personnel and Service Providers.

Any persons carrying out works for which a licence or certificate is required must provide proof of competency prior to undertaking those works. Any person carrying out high risk construction works must be assessed for competency. Recording and monitoring of licences held by Service Providers must be undertaken in accordance with the relevant WRMP.

All Mirvac personnel and Service Providers are expected to always act in a manner consistent with the four safety behaviours in Mirvac's safety culture program, **Work Safe, Stay Safe**, being Lead By Example, Cut Risks, Not Corners, It's Your Responsibility and Always Put Safety First. Any failure of a Mirvac employee to satisfy their HSE obligations may result in disciplinary action which, in certain circumstances, could include dismissal.

Key links

- [Mirvac Training Schedule](#)
- [Work Safe, Stay Safe](#)
- [Unacceptable HSE Performance Procedure](#)

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ELEMENT 9 - LEGAL & COMPLIANCE

Purpose

HSE legal and other requirements relevant to our operations are to be identified, understood and complied with.

SYSTEM REQUIREMENT

Mirvac maintains a **Legal Register** which identifies all WHS Acts & Regulations, Codes of Practice and Australian Standards relevant to our operations. The company **Legal Register** is maintained by the Group Safety Manager.

Mirvac subscribes to the **Workplace Safety Australia** online legal platform and **SAI Global**. Complete copies of each of the WHS Acts & Regulations as well as Codes of Practice identified in the **Legal Register** may be accessed via the **Workplace Safety Australia** legal platform and all Australian Standards identified in the Legal Register may be accessed via **Australian Standards (SAI Global)**.

All amendments to WHS Acts & Regulations, Codes of Practice and Australian Standards will be monitored for changes through the **Workplace Safety Australia** online legal platform by the Group Safety Manager. All changes will be reviewed, and where relevant, communicated to the National HSE Managers. Any changes which require a change to the Mirvac System will be made by the Group Safety Manager accordance with this Element 9 and Element 11 – Management of Change and then communicated to the National HSE Managers and other relevant personnel. Any changes relevant to a Business

Unit or workplace will be identified by the National HSE Manager and changes to documentation and communication to relevant personnel will be actioned.

Whenever Mirvac has management and control of a construction project a register of all legal requirements for that project must be maintained and amended where necessary in accordance with the Business Unit Management System Manual and the WRMP. As a minimum the company **Legal Register** must be amended by the National HSE Manager (or other relevant competent person) to identify those elements which apply to the project. The project specific legal register must be available at the workplace and it must be communicated to all workers in accordance with the WRMP.

Key links

- [Australian Standards \(SAI Global\)](#)
- [Workplace Safety Australia legal platform](#)
- [Legal Register](#)

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ELEMENT 10 - SERVICE PROVIDERS & SUPPLY CHAIN

Purpose

All Service Providers engaged by a Mirvac entity must exhibit a commitment to Mirvac's HSE vision. Additionally, Service Providers must be able to clearly identify, understand and comply with all HSE requirements relevant to Mirvac's operations.

HSE performance must be considered by all Mirvac personnel when involved in the engagement and management of Service Providers. Mirvac will use reasonable endeavours to address any safety risks in our supply chain, including in relation to how works or services are performed as well as the composition of building products.

SYSTEM REQUIREMENT

All Service Providers engaged by a Mirvac entity must exhibit a commitment to Mirvac's HSE vision, being the continued pursuit of safety excellence whilst improving the overall health and wellbeing of our employees and communities, by making safety integral to their operations. All Service Providers are

expected to always act in a manner consistent with the four safety behaviours in Mirvac's safety culture program, **Work Safe, Stay Safe**, being Lead By Example, Cut Risks, Not Corners, It's Your Responsibility and Always Put Safety First.

Service Providers must be able to clearly identify, understand and comply with all HSE requirements, legal and otherwise, relevant to Mirvac's operations. Processes and procedures must be in place in within each Business Unit to ensure HSE requirements and responsibilities are clearly set out in the tendering, engagement and on-boarding processes. The decision to engage any Service Provider must reflect the associated HSE risk and be approved by the appropriate delegated authority. Business Units must also have processes and procedures in place to verify that Service Providers comply with all relevant HSE requirements whilst performing works. Any failure of a Service Provider to satisfy their HSE requirements must be appropriately addressed which, in certain circumstances, may include termination or prohibition from tendering for future works.

All relevant Service Providers have a positive obligation to, so far as reasonably practicable, ensure building products they use are safe and fit for their intended purpose and to also ensure the safety of their activities and those of others within their supply chain.

Whenever a Mirvac operating entity engages a Principal Contractor the **Principal Contractor Engagement & Management Procedure** must be adhered with. Whenever a Mirvac operating entity has management and control of a workplace all Service Providers must be made aware of and comply with the **Mirvac Minimum Requirements**, being the minimum requirements for the management of our critical risks.

All Service Providers carrying out work at a workplace are made aware of, and inducted into, the relevant HSE issues identified in the Risk & Opportunity Register (which is attached to the WRMP) prior to commencing work.

Key links

- [Principal Contractor Engagement & Management Procedure](#)
- [Mirvac Minimum Requirements](#)
- [Work Safe Stay Safe](#)
- [Service Provider Daily Inspection & Risk Assessment](#)
- [Service Provider HSE Implementation Review](#)
- [Service Provider Tender High Risk Work HSE Assessment](#)

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ELEMENT 11 - MANAGEMENT OF CHANGE

Purpose

All planned and unplanned changes which may have a material impact on HSE must be identified, managed, and where appropriate, properly communicated.

SYSTEM REQUIREMENT

There are various instances where a change may have a material impact on HSE. These may be both proactive and reactive, and include:

- a change in legislation;
- a design change;
- a change in practices arising from an incident or learning;
- a change in the working environment;
- adverse weather changes;
- re-sequencing of works; and
- changes in personnel.

There are various tools which enable the identification, management and (where appropriate) communication of change. These include:

- changes to the HSE Management System documentation must be managed in accordance with the **Document Control Procedure**;
- changes to legal requirements to be managed in accordance Element 9 – Legal & Compliance;
- changes in design are managed in accordance with **DOOR Procedure**; and
- changes impacting a workplace, such as a change in design during the construction process, or change to hazard controls must be managed in accordance with the relevant Workplace Risk Management Plan and the Risk & Opportunity Register.

Key links

- [Document Control Procedure](#)
- [DOOR Procedure](#)

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ELEMENT 12 - MONITORING, AUDIT & CONTINUOUS IMPROVEMENT

Purpose

Regular and effective monitoring, analysis and auditing is to be undertaken to ensure Mirvac complies with its HSE Management System (**System**) requirements, while always pursuing continuous improvement in HSE performance.

SYSTEM REQUIREMENT

Audits to measure the effectiveness of implementation of the System will be conducted in accordance with the **Audit Procedure**. All business units will also develop and implement an audit regime to verify it complies with its HSE obligations and which reflects the risks relevant to its operations. Results of all audits and reviews, together with evidence of the resolution of all corrective actions, must be accurately recorded and reported to senior management.

All HSE incidents and near misses are to be reported, investigated and analysed in accordance with Element 5 – Incident Management. Evaluation of corrective actions and incident / near miss trends is to be undertaken in forums such as Incident Review Boards and the HSE&S Committee. Any learnings from such evaluations are to be shared with all relevant Mirvac personnel and stakeholders.

Key links

- [Audit Procedure](#)
- [Audit Tool](#)
- [CFA \(Critical Focus Area\) Audit Tool](#)

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