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Workplace Health and Safety Policy

The management of Build 369 is committed to establishing and maintaining a safe and healthy work environment for our employees, contractors and visitors.

Our aim is to develop and nurture a safety culture where WHS continues to be a part of the way we do business.

The Build 369 WHS Policy involves the continual development of a system based on *ISO 45001:2018*, the WHS Legislation, and ensuring, so far as reasonably practicable, we consistently and reliably satisfy, or exceed, our client's expectations.

The WHS Act requires a Person Conducting a Business or Undertaking to exercise due diligence and to be proactive in ensuring WHS obligations are met.

Build 369 is committed to these objectives and will achieve this by:

- Being aware of and complying with the *Work Health and Safety Legislation*, all associated legislature and all other requirements that we subscribe to;
- Committing to a collaborative process via consultation, cooperation and coordination with contractors and employees and encouraging feedback to ensure the best possible outcome is achieved;
- Identifying high risk construction work, developing and implementing appropriate safe systems of work, safe work method statements and training;
- Ensuring that appropriate resources and processes are used to eliminate or minimize risks to health and safety arising from work being done;
- Responding promptly to information regarding incidents, hazards and risks;
- Taking appropriate action when employees or others under our direction disregard safety procedures and practices;
- Developing and implementing plans and procedures for the effective operation and management of our processes; and
- Gathering safety statistics to ensure performance standards and key performance indicators are monitored regularly.

Build 369 supports the harmonisation goals of the Federal and State Governments, and is committed to continual improvement in safety management. This includes regular monitoring, assessment and review of all aspects of the system by both internal and external audits.

Safety is no accident and is a team effort. All persons who work for Build 369 have a personal and moral responsibility for the implementation of this policy to achieve a safer workplace for all.

This policy will be reviewed annually in consultation with employees.

A handwritten signature in black ink, appearing to read "Zoran Sever".

Zoran Sever
Managing Director
April 2021

Environmental Policy

The management of Build 369 is committed to establishing and maintaining sound work environments with a priority given to progressive and responsible environmental management. Our aim is to minimise the harmful environmental impacts of our operations, and to propagate a culture of environmental responsibility.

The Build 369 Environmental Policy involves the continual development of a system based on *ISO 14001:2015* and environmental legislation and ensuring, so far as reasonably practicable, we consistently and reliably satisfy, or exceed, our client's expectations.

Build 369 is committed to these objectives, and will achieve this by:

- Identifying environmental impacts and applying appropriate environmental actions;
- Promoting a culture where 'prevention of pollution' is a consideration in the decision making process;
- Reducing and minimizing, where reasonable, the environmental footprint from our business activities;
- Being aware of, and complying with applicable environmental legislation and other requirements that we subscribe to, leading to the development of suitable monitoring and review activities;
- Working cooperatively and transparently with the community, stakeholders and relevant agencies to ensure successful environmental outcomes;
- Ensuring company leaders actively promote and encourage responsible environmental principles;
- Making relevant environmental training available as an integral part of our business to improve awareness, knowledge and skills;
- Developing and implementing plans and procedures for the effective operation and management of our processes;
- Taking appropriate action when employees or others under our direction disregard environmental procedures and practices;
- Meeting performance standards and key performance indicators, and taking action to improve performance through regular and formal reviews; and
- The promotion of environmental strategies to ensure sustainable work practices.

Build 369 is committed to continual improvement in environmental management. This includes regular monitoring, assessment and review of all aspects of the system by both internal and external audits.

Environmental management and care is a team effort. All persons who work for Build 369 have a personal and moral responsibility for the implementation of this policy.

This policy will be reviewed annually in consultation with employees.

A handwritten signature in black ink, appearing to read "Zoran Sever".

Zoran Sever
Managing Director
April 2021

Quality Policy

The management of Build 369 is committed to providing quality products and services to our clients, and promoting a workplace culture aimed at achieving the highest standard possible.

The Build 369 Quality Policy is a reinforcement of this commitment which involves the continual development of a system based on *ISO 9001:2015* and ensuring, so far as reasonably practicable, we consistently and reliably satisfy, or exceed, our client's expectations.

Build 369 is committed to these objectives, and will achieve this by:

- Determining the needs of our clients with the aim of enhancing client and product satisfaction;
- Being aware of the relevant documents, specification and other contractual requirements to allow the development of suitable recording and review activities;
- Ensuring company leaders actively promote and demand quality workmanship;
- Making relevant training available as an integral part of our business to improve awareness, knowledge and skills;
- Developing and implementing plans and procedures for the effective operation and management of our processes;
- Taking appropriate action when employees or others under our direction disregard quality procedures and practices;
- Implementing systems and procedures to identify, report and track non-conformances as part of our commitment to continual improvement; and
- Meeting performance standards and key performance indicators, and taking action to improve performance through regular and formal reviews.

Build 369 is committed to continual improvement in quality management. This includes regular monitoring, assessment and review of all aspects of the system by both internal and external audits.

Providing a quality product and service to our clients is a team effort. All persons who work for Build 369 have a personal and moral responsibility for the implementation of this policy.

This policy will be reviewed annually in consultation with employees.

A handwritten signature in black ink, appearing to read "Zoran Sever".

Zoran Sever
Managing Director
April 2021

Rehabilitation Policy

Build 369 is committed to providing a safe and healthy workplace for all workers. In the event of a work related injury we will take all necessary steps to ensure the injury does not happen again.

Should one of our employees incur a work related injury that means they are unable to continue their normal work we will provide the necessary assistance for them to remain at work, or return to work as soon as it is safely possible.

- To make every effort to minimise work related injuries and illnesses by providing a safe workplace and encouraging employees to immediately report any hazards observed.
- To ensure that rehabilitation follows a work related injury or illness, an on-site rehabilitation coordinator will be appointed to monitor and coordinate the return to work plan and to assist where ever possible in the return to work;
- To initiate the rehabilitation process as quickly as possible after a work related injury or illness while ensuring that participation in the program will not disadvantage the affected employee;
- To encourage all employees to support the affected employee and their return to work program;
- To assist the employee to find another position if the employee is unable to return to previous duties;
- To assist any seriously injured employee who cannot return to the workforce, achieve the greatest independence in day-to-day living through appropriate case management; and
- To advise all employees of this policy, the existence of alternative duties and the individual responsibility to participate in rehabilitation program if the need arises.

Build 369 Rehabilitation Coordinator is the Managing Directors.

This policy represents our commitment to occupational rehabilitation and return to work following a work related injury.



Zoran Sever
Managing Director
April 2021

Mutual Respect Policy

Build 369 is committed to providing a workplace that is free of discrimination. This will be achieved in an environment where everyone is treated fairly and where a culture of mutual respect applies. All employees will be given equal opportunity to reach their potential regardless of personal attributes.

Build 369 recognises that harassment including sexual harassment can be a form of discrimination and is unlawful.

All instances of alleged discrimination/harassment will be treated seriously, quickly and confidentially, with any subsequent investigations to be conducted fairly and impartially. Any person involved in an allegation/complaint will not be victimised in any way.

Discrimination and harassment occur when a person is discriminated against or harassed in the workplace and in certain areas of public life because of:

- Their race, colour, descent or national or ethnic origin, as defined under the *Racial Discrimination Act 1975*;
- Their sex, marital status, pregnancy as defined under the *Sex Discrimination Act 1984*;
- A disability as defined under the *Disability Discrimination Act 1992*;
- Age as defined under the *Age Discrimination Act 2004*; and
- Some grounds under the *Human Rights and Equal Opportunity Act 1986*;

To meet our Mutual Respect commitments, Build 369 will promote diversity and foster an environment where all employees have positive working relationships with each other.

This policy represents our commitment to having a workplace free of discrimination or harassment.

A handwritten signature in black ink, appearing to read "Zoran Sever".

Zoran Sever
Managing Director
April 2021

Drug and Alcohol Policy

As part of Build 369 ongoing obligation and commitment to maintaining a safe workplace it is our aim to ensure that our employees and other workers in all Build 369 workplaces are physically, emotionally and mentally fit to perform their duties unaffected by alcohol or drugs.

This policy applies to all employees and subcontractors and their employees.

Breaches of this policy will lead to disciplinary action with serious or repeated breaches being dismissible offences.

To meet our Drug and Alcohol Policy commitments, Build 369 will:

- Prohibit employees and other workers from work if they are affected by alcohol.
- Prohibit alcohol consumption during the workday, including rest and meal breaks and the use of personal possession of alcohol during work time at a Build 369 workplace is considered to be a serious breach.
- Where a management approved function is held at a Build 369 workplace the quantity of alcohol provided will be limited and approved by the relevant manager. Low and non-alcohol beverages must also be available and it is expected that all persons will adopt a responsible attitude to alcohol consumption.
- Prohibit the use, sale or personal possession of illegal drugs during work time at any Build 369 workplace, as it is considered a serious breach and can result in criminal prosecution.
- Ensure that any person taking prescribed medication or pharmaceutical (over the counter) drugs reports the use to management where it is known by the user that their use may affect their ability to perform assigned duties.
- Consider alcoholism and other drug addictions to be a treatable illnesses and will assist persons to enter approved counselling and treatment programs where requested.
- Meet duty of care responsibilities by conducting random drug and alcohol testing if a risk assessment determines there is a risk to a person's health or safety.

This policy represents our commitment to having a workplace free of alcohol and drug use.



Zoran Sever
Managing Director
April 2021

COVID-19 WHS Policy

Build 369 will as far as possible, plan for and make advance preparations for the possibility that its operations will be affected by coronavirus (COVID-19). This policy should be read in conjunction with the *Construction Site COVID-19 WHS Management Plan*.

The purpose of this policy is to outline the strategies and actions that Build 369 intends to take to prevent the transmission of COVID-19 and control the transmission of COVID-19 when a case is identified in the workplace. Build 369, as far as reasonably practicable, will:

- Assist staff, subcontractors, workers, visitors, suppliers and others as relevant, to minimise their exposure to COVID-19;
- Encourage and assist those who have reason to believe that they are at risk for contracting COVID-19 to obtain a diagnosis;
- Support workers and others to take reasonable precautions to prevent infection or contagion;
- Provide standard precautions such as personal protective equipment i.e. soap, hand sanitiser, masks and gloves;
- Limit in-person non-essential meetings;
- Appoint a Manager responsible to direct preparation activities and manage the implementation of risk control systems for COVID-19, including ongoing communication and consultation with workers; and
- Maintain our services and operations throughout the period of concern unless directed otherwise.

Build 369 requires workers covered by this policy to take the following precautions:

- Regularly and thoroughly clean your hands with soap and water and/or an alcohol based hand sanitiser;
- Where possible, maintain at least 1.5m distance between yourself and others and in particular anyone who is coughing or sneezing;
- Avoid touching your eyes, nose and mouth, or shaking hands with others;
- Make sure you follow good hygiene, and encourage others to do the same. This means covering your mouth and nose with your bent elbow or tissue when you cough or sneeze, and disposing of used tissues immediately;
- Keep up to date on the latest information;
- Avoid travelling;
- Persons who have travelled from overseas or from interstate where restrictions apply, must disclose this and will be excluded from entering the workplace;
- Stay at home if you develop symptoms i.e. temperature, cough or shortness of breath. Seek medical advice promptly and follow the directions of the local health authority;
- If you are or are likely to be contagious or develop symptoms while at work, notify your manager immediately (It may be necessary for you to self isolate on site until it is possible for you to seek medical advice.
- Stay at home until you recover and obtain medical clearance to return to work if you test positive for COVID-19.

In carrying out the procedures above, Build 369 will be guided by the information and directions provided by the local health authority and the Regulator in meeting our WHS obligations.

Build 369 will communicate, review and update this policy and the *Construction Site COVID-19 WHS Management Plan* and to include new information as it develops for the duration of this pandemic.

A handwritten signature in blue ink, appearing to read "Zoran Sever".

Zoran Sever
Managing Director
April 2021

Secure Local Jobs Policy

INTRODUCTION

Build 369 Pty Ltd has developed this Policy to meet its obligations to Part 3 of the Secure Local Jobs Code and its obligations of a Code Certified Entity.

PURPOSE OF THE POLICY

The purpose of this policy is to:

Build 369 Pty Ltd communicates with employee(s) and/or sub-contractor(s) as part of their contract with the ACT Government and they will issue this document to them to ensure that its obligations under Part 3 of the Secure Local Jobs Code, specifically Part 3 as outlined below are met. It is intended to use this Policy as part of their Employee Induction process.

PART 3 OBLIGATIONS OF A CODE CERTIFIED ENTITY

11. ADHERENCE TO THE LAW

(1) A Code Certified Entity must comply with:

- (a) applicable Industrial Law, including but not limited to, the Prescribed Legislation;
- (b) all applicable orders, directions and decisions of any court, tribunal, board, commission or other entity (including but not limited to the Fair Work Commission) with jurisdiction to consider the interpretation, breach or any other matter concerning the Prescribed Legislation; and
- (c) any Industrial Instrument that applies to that entity.

(2) A Code Certified Entity must notify the registrar in writing of

any Adverse Ruling made against it, or its Subcontractors, or it is becoming aware of a failure to comply with Code obligations, within 5 working days of such a ruling being made or such awareness arising.

12. REQUESTS FOR INFORMATION

(1) A Code Certified Entity must, subject to law, comply with any reasonable request for information, access to records and directions given by the registrar or an approved auditor for the purposes of investigating Code compliance pursuant to this Code and the GPA.

13. WORKPLACE REPRESENTATION

(1) A Code Certified Entity must if requested by two or more employees facilitate the conduct of an election amongst its employees to elect whichever of the following is requested:

- (a) a union workplace delegate; or
- (b) another employee representative.

(2) Where a union workplace delegate or other employee representative has been elected, the Code Certified Entity must ensure:

(a) there is no unlawful discrimination against the union workplace delegate or employee representative in their employment;

(b) there is no Adverse Action taken by the Code Certified Entity as an employer against a union workplace delegate or employee representative who is an employee on the basis that they are a union workplace delegate or employee representative;

(c) reasonable requests from a union workplace delegate to represent an employee, who is an employee eligible to be a member of the union workplace delegates Eligible Union, in relation to a grievance, dispute or discussion with another employee of a Code Certified Entity are not refused; **and**

(d) reasonable requests from an employee representative to represent an employee, who is an employee who participated in the election of the employee representative, in relation to a grievance, dispute or discussion with another employee of a Code Certified Entity are not refused.

(3) Code Certified Entities must ensure that their employees have a right to decide whether or not they will be represented in grievance or dispute procedures (whether or not pursuant to an Enterprise Agreement), and, if so, by whom.

(4) If a union workplace delegate or employee representative is elected under subsection (1) for a Code Certified Entity, the Code Certified Entity must put in place practices and procedures to facilitate the conduct of union workplace delegates' or employee representative's roles at the workplace level, and which recognise that the rights of a union workplace delegate or employee representative (where in place) include but are not limited to:

(e) the right to be treated fairly and to perform their role without any discrimination in their employment;

(f) recognition by the Code Certified Entity that union workplace delegates or employee representatives elected under subsection (1) speak on behalf of employees who elected them;

(g) the right to participate in collective bargaining on behalf of those whom they represent, as per the Fair Work Act 2009 (Cth);

(h) the right to reasonable paid time to provide information to and seek feedback from the employees that elected them on workplace relations matters during normal working hours of the Code Certified Entity;

(i) the right, subject to law, to email employees who they represent to provide information and seek feedback, subject to individual employees exercising a right to opt out;

(j) reasonable access to Code Certified Entity facilities (including telephone, facsimile, photocopying, internet and email facilities, meeting rooms, lunch rooms, tea rooms and other areas where employees meet) and relevant information for the purpose of carrying out work as a union workplace delegate or employee representative, including meeting and consulting with employees who elected them or any other interested employee, subject to the Code Certified Entity's policies and protocols;

(k) the right to reasonable paid time for union workplace delegates or employee representatives to attend accredited union training (in the case of a union workplace delegate) or other relevant training (in the case of employee representatives); **and**

(l) the right to reasonable paid time for union workplace delegates or employee representatives to represent the interests of those that elected them, to the employer, or before industrial tribunals.

14 EMPLOYEE REPRESENTATION AND WORKPLACE INDUCTIONS

- (1)** A Code Certified Entity must understand and respect their employees' rights, including in relation to freedom of association and the right to representation at work as required by Part 3-1 of the Fair Work Act 2009 (Cth). This includes acknowledging employees' right to join or not to join a union and be represented at work.
- (2)** For the purposes of the Code, subsection (1), will be considered met if a Code Certified Entity:
- (a)** informs all new employees who are eligible to become members of Eligible Union(s) at the commencement of employment, about their right to choose to join or not join an Eligible Union, including providing information about the Eligible Union(s) and an application form for membership of the Eligible Union(s);
 - (b)** informs all new employees that they have the right to elect an employee representative.
- (3)** A Code Certified Entity must make copies of the applicable Industrial Instrument(s) available to all employees in the most accessible format.
- (4)** A Code Certified Entity must ensure new employees receive induction training from an appropriately skilled and experienced person and that the training is tailored to their specific duties and workplace(s).
- (5)** Employees must receive induction training while on paid time at the commencement of employment and/or the commencement of a project.
- (6)** Induction training should be held on a group basis where practicable and provide training and information on:
- (a)** the Code Certified Entity's employment policies; and
 - (b)** conditions of employment and service, including consultation and dispute resolution procedures and the employees' ability to have a representative of their choice (if they first elect to have a representative) in attendance during the dispute resolution process; and
 - (c)** lines of authority and accountability; and
 - (d)** health, safety, emergency and security procedures, including all hazards and risks associated with the tasks and the control measures to be used and procedures for reporting hazards and incidents.

15 RECOGNITION OF THE RIGHT TO COLLECTIVELY BARGAIN

- (1)** For this section:
bargaining representatives is defined in section 176 of the Fair Work Act 2009 (Cth). employee organisation means an organisation of employees.
- (2)** Code Certified Entities must make their employees aware of their employment rights, including the right to collectively bargain.
- (3)** Section 15(2) will be satisfied if the Code Certified Entity provides a Fair Work Information Statement in accordance with section 125 of the Fair Work Act 2009 (Cth) and provides induction training in accordance with section 14 of this Code.
- (4)** Where a Code Certified Entity has employees that are eligible to be members of an Eligible Union they must make such arrangements as are necessary to allow their employees', bargaining representatives from the Eligible Union(s) and all other bargaining representatives to participate in negotiations to develop Enterprise Agreements that are appropriate to the circumstances of the individual enterprise or industry.
- (5)** In undertaking negotiations related to the development of an Enterprise Agreement, a Code Certified Entity must recognise that employees are free to choose their bargaining representatives and must not adopt or implement policies or practices that seek to encourage their employees to appoint a particular entity or person as their bargaining representative.
- (6)** A Code Certified Entity must not adopt or implement policies or practices that seek to encourage their employees to revoke the status of an employee organisation as their bargaining representative for a proposed Enterprise Agreement.

(7) A Code Certified Entity shall make reasonable allowances for their employees and their bargaining representative (where in place) to participate in negotiations to develop Enterprise Agreements, including but not limited to:

- (a)** allowing employees paid time to meet with their bargaining representatives regarding Enterprise Agreement negotiations;
- (b)** meeting regularly with bargaining representatives in good faith for the purpose of enterprise bargaining negotiations; and
- (c)** allowing a union workplace delegate or employee representative to distribute material to the workplace concerning bargaining.

(8) In the course of collective bargaining, a Code Certified Entity, or their representative or agents, must not:

- (a)** advise, encourage, incite or coerce an employee to revoke the bargaining status of the bargaining representative; or
- (b)** hold negotiations with relevant employees regarding the Enterprise Agreement without first providing bargaining representatives a reasonable opportunity to attend the negotiation.

16 Freedom of Association

(1) A Code Certified Entity must respect employee rights in relation to freedom of association by adopting and implementing policies and practices that ensure employees are:

- (a)** free to become members of Eligible Unions; and
- (b)** free to be represented by Eligible Unions; and
- (c)** free to participate in lawful industrial activities; and
- (d)** not discriminated against in respect of benefits in the workplace because they are, or are not, members of an Eligible Union.

(2) A Code Certified Entity will provide all protections in relation to freedom of association as required by the Fair Work Act and shall give full recognition to an employee's rights by:

- (a)** not preventing or deterring an employee from joining and participating in the Eligible Union; and
- (b)** allowing for payroll deduction or facilitating direct debit of union membership fees; and
- (c)** not advising, encouraging, inciting or coercing an employee to resign their membership of an Eligible Union.

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Zoran Sever
Managing Director
April 2021