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### Document Approval

<b>Document Owner</b>	HSEQ Coordinator
<b>Checked By</b>	Managing Director
<b>Approved By</b>	Managing Director

### History of Amendments

Revision Number	Date	Clause	Summary of Amendments
0	01/02/2010		Original
1	05/01/2011	All	Updated to include Health Safety and Environment ISO requirements
2	13/04/11	<ul style="list-style-type: none"> <li>• Opening paragraph</li> <li>• Additional achievement</li> <li>• Distribution listing</li> </ul>	Addition of company services information New section on distribution
3	01/03/2012	All	Addition of statement regulatory obligations
4	02/07/2013	All	Addition of obligations for ISO standards and RTO information
5	20/11/2013	Attachment A	Addition of HSEQ Strategy attachment inline with WHS Act 2011 and Officer Due Diligence Requirements. Elaboration on Robson Trainers qualifications
6	08/08/2014	Policy achievements Attachment A	Update to include Business planning Update to HSEQ Strategy

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Robson Environmental (Robson) is committed to being a responsible member of the community and to carrying out our activities in a manner responsive to the social, environmental and economic needs of all stakeholders (present and future).

To achieve this, Robson will:

- Maintain an integrated Health Safety Environment and Quality management system (HSEQMS) based on ethical conduct, customer service, and a commitment to personal health and safety, the environment and the community. The HSEQMS will comply with the requirements of AS/NZS 4801, ISO 14001 and ISO 9001
- Continuous improvement will be monitored and measured in the performance of day to day operations, compliance with applicable laws, regulations and standards and internal procedures and the development of personnel.
- Risk management will be a prime focus of the approach to health safety and the environment.
- Officers under the Work Health and Safety Legislation will evidence Due Diligence requirements. Attachment A: *Work Health and Safety Strategy* details these requirements.
- The Directors, Managers and Supervisors are responsible for the implementation of and compliance with this Policy and the associated HSEQ programs.
- Ensure open and transparent communication with interested and affected parties and work towards customer satisfaction.
- Formalise and implement health and safety consultation processes and actively encourage worker consultation in all matters affecting health and safety.
- Minimise risk in work practices by providing the necessary resources and training.
- Responsibly participate in the development of employees through providing training and by promoting individual responsibility and ownership of policy and procedure implementation.
- Minimize impacts on the environment through the prevention of pollution and promotion of sustainable practices.
- Promote the protection of human health, the identification of risks and the elimination, so far as is reasonably practicable, of the fundamental causes that occasion losses.
- Regularly monitor, audit and review the company's HSEQ performance against internal objectives and targets set within the Business planning and Section Operational plans
- Comply with relevant regulatory obligations and industry specific guidelines.

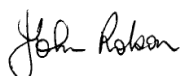
The company's employees and contractors are responsible and held accountable for carrying out their activities in accordance with the above principles. They are required to cooperate and comply with this Policy and associated programs and related procedures to ensure risk minimisation. Further, the company will encourage the adoption of these principles by organisations working in a close relationship with the company.

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**Breach of Policy**

Employees who consistently abuse these guidelines may be dealt with under the Robson Behaviour Management Procedure



**John Robson  
Managing Director  
Robson Environmental Pty Ltd  
12 August 2014**

**Employee Declaration**

I have read and understand the policy requirements and I agree to adhere to them.

**Employee Name:**


**Employee Signature:**

**Date:**

**Attachments:**

- *Attachment A: Work Health and Safety Strategy details these requirements.*

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## **ATTACHMENT A: Work Health and Safety Strategy**

### **Work Health and Safety (WHS) Strategy Overview**


The management of WHS is complex with duties placed on the company (PCBU), its Officers and workers. The supportive tools developed within the HSEQMS aim to enable a greater understanding of duties required to meet health safety, environment and quality legislation and standards. They are based on legislative requirements, approved Codes of Practice, legal advice and Australian and International standards.

There were some key changes made under the Work Health and Safety Act 2011 and the following table details the changes to safety duties:

**Table 1: WHS Key Roles and Responsibilities**

<b>Responsibility</b>	<b>Description</b>	<b>Participating Roles</b>
Primary duty of care	Comply with WHS legislation by implementing Work Health and Safety Management Systems	PCBU (s.20 WHS Act 2011) [Robson Environmental Pty Ltd]
Officers due diligence	Due diligence (s.27) to ensure PCBU meets duties – comply by implementation of Work health and Safety management systems that deals with PCBU’s duties to workers (s.19(1)) and others (s.19.(2))	Officers (s.27 WHS Act 2011) [Directors and Business Partners]
Take reasonable care and comply with reasonable WHS instructions	Take reasonable care for own health and safety and that own acts or omissions do not adversely affect the health and safety of others Comply with any reasonable instruction given by the PCBU for compliance with the WHS Act	Workers (s.28 WHS Act 2011)) Other persons in the workplace [includes visitors]
Governance	Advice to the Officers on policy and strategy to assist with compliance with WHS Act duties	<ul style="list-style-type: none"> <li>• Management Team</li> <li>• HSEQ Committee</li> </ul>
Operational WHS Resourcing	Day to day support, including provision of tools and guidelines, for meeting duties and auditing.	<ul style="list-style-type: none"> <li>• HSEQ Coordinator</li> <li>• Section HSEQ Administration support</li> </ul>
Operational WHS Consultation	The agreed WHS consultation process is through regular section meetings. Issues requiring further input and decisions are raised through the Management Team meetings. Contractor and client consultation methods are detailed in the HSEQ Policies and Business Procedures and Section specific standard operating procedures.	<ul style="list-style-type: none"> <li>• Section Meetings</li> <li>• Management Team</li> <li>• HSEQ internal auditors</li> </ul>
Internal and External audit review processes	Internal audits of policies, procedures and compliance with duties External audits of policies, procedures and compliance with duties	Internal audits – HSEQ Committee External audits – external provider

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### **Six Elements of Due Diligence for Officers**

The following is a condensed listing of the Six Due Diligence Elements required to be met by Officers. For full description from the *WHS Act, Part 2, Division 4, Section 27 Duty of officers subsection (5)*.

- Element 1** – acquiring and keeping up-to-date work health and safety knowledge;
- Element 2** – gaining an understanding of the nature of the Company’s operations and of hazards and risks associated with those operations;
- Element 3** – providing, and using, appropriate resources to eliminate or minimise risks to health and safety from work carried out by the Company
- Element 4** – considering incidents, hazards and risks;
- Element 5** – ensuring legal compliance; and
- Element 6** – verification of the implementation of processes and resources above.

### **Due Diligence Approach**

A key feature of the Company’s approach is the commitment to the continuous improvement of specific work health and safety controls to enhance compliance with Due Diligence and consultation requirements.

**Table 2: Typical requirements and expectations of Internal Interested Parties and Stakeholders**

Internal Interested Party/Stakeholder	Typical requirements and expectations
<b><i>Due Diligence duties:</i></b>	
Directors and Partners	Duties as Officers under the Work Health and Safety Legislation
Managers who, apart from the Directors and Partners, may fit within the definition of an Officer	Duties as Officers under the Work Health and Safety Legislation
<b><i>Supporting Officers in their Due Diligence duties, including consultation:</i></b>	
Company Work Health and Safety professionals	Knowledge of skills in, resources for and management commitment to, Work Health and Safety management
Management Team	Governance committee overseeing this framework
Section Managers	Hold monthly Section meetings where the WHS consultation process is documented
HSEQ Committee	Additional consultation process where required, internal auditing process and reporting to the Governance Management group
HSEQ Representatives	Participation in the HSEQ audit and consultation process for HSEQ system developments
Third Party workers as defined under the WHS legislation	Company Code of Conduct and Section Specific consultation processes established where the Company directs workers performing work on behalf of the Company.

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