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## Workplace Health & Safety Policy

GCB Constructions (GCB) Workplace Health & Safety Policy is based on a belief that the wellbeing of people employed at work, or people affected by our work, is a major priority and must be considered during all work performed on our behalf.

GCB is committed to continually improving the WH&S Management system by establishing WH&S objectives, targets, performance measures and regularly reviewing progress against these criteria. People are our most important asset and their health and safety is our greatest responsibility. The public shall be given equal priority to that of our employees and we are committed to continually improving our health and safety performance. GCB and all staff shall comply with both the letter and the spirit of all applicable occupational health, safety and welfare legislation, statutory and other identified requirements. The objectives of our WHS Policy are to:

- Achieve an accident free workplace;
- Make health & safety an integral part of every role within GCB;
- Establish a WHS system to ensure health & safety is considered and constantly reviewed in all planning and work activities;
- Involve our employees and other key people in decision making processes through regular communication, consultation and training;
- Provide a continuous program of education and learning to ensure that our employees work in the safest possible manner;
- Identify and control all potential hazards in the workplace through hazard identification and risk analysis;
- Ensure all potential accident/incidents are controlled and prevented; and
- Provide effective injury management and rehabilitation for all personnel.

The success of our health & safety management is dependent on:

1. Proactive planning of all work activities with consideration given to implementing WH&S controls that are suitable to each given situation;
2. Development of a WHS Management system to comply to the requirements of AS/NZS 4801 and relevant future standards and legislation;
3. Understanding the total work process and associated WH&S risks;
4. Ensuring the work team is totally committed to achieving our objectives; and
5. Facilitating and ensuring that open and honest communication exists between management and all personnel.

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## Quality Policy

GCB Constructions (GCB) objective is to satisfy the requirements of our customers and the marketplace by consistently and predictably providing products and services that comply with relevant Specifications, Codes, Australian Standards, supply agreements and contractual obligations in a timely manner.

To meet this objective, GCB is committed to implementing and maintaining a Quality Management system based on the requirements of the International Standard, ISO 9001.

The core elements of the Quality Management system are:

- A comprehensive and concise review process that will ensure that our customers' requirements are fully understood and adhered to.
- Provide personnel who are experienced, trained and are provided with the appropriate resources necessary to deliver to our customers' requirements and expectations, at all times.
- Management System objectives, specific performance expectations agreed with our customers and Key, as well as, Positive Performance Indicators (KPI / PPI's) for all personnel to ensure we meet our objectives.
- Processes to continually review and improve the Management System to maintain its integrity and to ensure it keeps pace with the evolution of our company, customers and industry requirements.
- Reporting processes that provide information to our customers, Executive Management and personnel on the quality of the product and services we provide.
- Observance and compliance with all statutory and regulatory requirements.

These objectives are fundamental to our success now and in the future. All employees are responsible for working in accordance with the documented Management System and to review and identify ways to continually improve the system.

With these processes, we will continue to challenge and improve the quality of our products and services to meet the ongoing demands of our customers. Our commitment to quality is fundamental to the concept of continuous improvement.

Quality is the responsibility of all personnel which includes employees, suppliers and contractors.

## Environmental Policy

GCB is committed to operating and maintaining their operations, activities and their associated facilities in an environmentally responsible manner and have implemented a systematic approach to fully controlling damage to the environment.

This commitment is achieved by:

- Providing resources in line with the importance attached to our environment that will be made available to comply with all relevant Acts and Regulations and to ensure that the workplace is safe and without risk to health;
- Developing, implementing and continually improving a third party accredited environmental management system conforming to ISO 14001;
- Complying with all relevant legal, contractual and other requirements regarding environmental performance and monitoring;
- Consult with the necessary authorities and specialist contractors regarding waste disposal;
- Eliminating and reducing environmental impacts, preventing pollution, and protecting the natural environment relating to our operations;
- Design and operate our systems to ensure the minimization of waste production and efficient management and use of resources including energy, water and materials;
- Training our staff to competently execute their duties and to understand their role in protecting the environment; and
- Demanding a high standard of environmental performance from our suppliers and contractors.

The promotion and maintenance of the environment in which we work is mainly the responsibility of management. Management at all levels of the organization are required to contribute to the positive overall environmental conditions at our place of work. All employees are required to co-operate with management so that the policy, programs and legislative requirements ensure that the environment remains in a safe and healthy condition.

GCB's commitment to continually improving environmental performance is driven by executive management and extends to all functions and levels of the organisation.

## Covid 19

GCB is committed to the health and safety of its employees, contractors, sub-contractor and the general public. We will adapt any official guidelines, changes and recommendations from State or Federal Government to our company's procedures to help minimize the spread of Coronavirus.

To help minimize the risk, GCB are committed to reducing the risk to its staff and onsite workers by:

- Limiting the physical interaction between workers, workers and clients, workers and other persons (eg. Delivery drivers) and use other methods of communications like phone and radio.
- Reduce the amount of site meetings, and where possible, have them online or phone conference
- Stop hand shaking and other physical greetings
- Promote good hand and cough hygiene and provide sanitisers for workers on all sites
- Have lunch outside (where practical), reduce the amount of seating in crib/ lunchrooms and stagger staff lunch times
- Wherever possible 1.5m distance from others is maintained, as well as making sure there is adequate room for 1 person per 2m<sup>2</sup> for each activity if possible.

We will provide all workers information about the risks of exposure to Covid-19. Where required, workers will be trained in infection control. Our sites have posters to educate and reiterate the importance of general hygiene practices.

All workers will undergo Covid-19 risk assessments, as well as current health questionnaires, and have access to site response chart.

The success of our Covid-19 management is dependent on:

1. Proactive planning of all work activities with consideration given to implementing WH&S controls that are suitable to each given situation
2. Development of a WHS Management system to comply to the requirements of AS/NZS 4801 and adapting the Covid-19 pandemic to minimize risk
3. Understanding the total work process and associated risks.
4. Ensuring the work team is totally committed to achieving zero contact and transmission
5. Facilitating and ensuring that open and honest communication exists between management and all personnel throughout the process.

## Modern Slavery Policy & Statement

### 1.0 Introduction

Under the Modern Slavery Act 2018 (Cth) (*the Act*), 'modern slavery' is defined as conduct which would constitute an offence under the human trafficking, slavery and slavery-like offence provisions under Divisions 270 and 271 of the Criminal Code Act 1995 (Cth), whether the conduct took place inside and outside of Australia. Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

### 2.0 Coverage

This policy applies to all employees, contractors and suppliers of GCB Constructions  
ABN:26 151 244 254

### 3.0 Purpose

This policy sets out GCB Constructions commitment to:

- Ensuring the company is compliant with Australian and international laws and regulations in the areas in which the company operates;
- Demonstrating our commitment to addressing modern slavery in all its forms; and
- Promoting awareness of concerns surrounding modern slavery to our employees and suppliers.

GCB Constructions operates in Australia and is dedicated to reducing the risk of modern slavery arising, directly or indirectly, out of its business activities and within its supply chain, both nationally and internationally.

### 4.0 Our Approach

We have a zero-tolerance attitude and approach to modern slavery and are determined to promote awareness within our workforce and supply chain of the risks relating to modern slavery. We are committed to acting ethically and with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to assess and manage modern slavery risks.

We expect that our employees and contractors will comply with this policy and always uphold our values and any breaches of our policy will be subject to investigation and potential disciplinary action.

We expect that our customers and suppliers match and reflect our dedication to preventing the existence of modern slavery within our supply chain and that they comply with all applicable legislation and regulations in relation to workplace rights and labour laws. Any breaches of our supplier agreements arising under this policy will be referred to General Counsel for investigation and potential breach action.

## **5.0 Modern Slavery Statement**

GCB Constructions is subject to the requirements of the Act as a reporting entity. Section 16 of the Act requires the company to submit an annual Modern Slavery Statement to identify and address the following mandatory criteria:

- The company's structure, operations and supply chains;
- Modern slavery risks in the reporting company's operations and supply chains (including those of subsidiary entities);
- Actions taken (including by subsidiary entities) to assess and address those modern slavery risks, including due diligence and remediation processes;
- How the company assesses the effectiveness of actions taken; and
- The process of consultation with subsidiary entities in preparing the modern slavery statement.

## **6.0 Communications, Awareness and Training**

To ensure GCB Construction employees and subcontractors are aware and educated of the nature and risks of modern slavery in the workplace, our modern slavery policy will be published and distributed to all employees who will also be able to access copies of these documents via the intranet.

GCB Constructions provides more specific training to those employees through whom the steps taken by the company in compliance with this policy are most likely to be taken. The aim of the training is to ensure a high level of understanding of the nature of modern slavery and the influence the company can bring to ensure that it does not occur within any part of its own business and in any of its supply chains.

GCB Constructions expects its suppliers and other business partners to provide similar training to their employees.

## **7.0 Breaches of this Policy**

The breach of this policy by an employee of the company may lead to disciplinary action being taken in accordance with the company's disciplinary procedure. Serious breaches may be regarded as gross misconduct.

All employees of the company will be expected to cooperate fully in any investigation into suspected breaches of this policy or any related processes or procedures.

If an issue is identified with a supplier, we will work with them to prepare a corrective action plan and resolve all violations within an agreed upon period. We reserve the right to terminate our relationship with individuals and organisations in our supply chain if they breach this policy.

## **8.0 Reporting**

The Commercial Manager will provide regular reporting to the Managing Director on:

- Any breaches of this policy; and
- Modern slavery risk and what the company is doing to address those risks identified on the risk register.

## **9.0 Responsibilities**

### **a. Policy Management**

The Managing Director has overall responsibility for this policy and in ensuring that the company complies with all its legal and ethical obligations. Approval of the Policy is vested with the Managing Director.

Reviews of the Policy are the responsibility of the Commercial Manager and will be conducted annually. This is to ensure that the policy remains consistent with all relevant legislative requirements as well as the changing nature of the company.

### **b. Policy Implementation**

The Managing Director will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

Managers at all levels are responsible for ensuring those reporting to them:

- Understand and comply with this policy; and
- Are given adequate and regular training on it and the issue of modern slavery.

All employees are responsible for following the policy to the extent that it affects their day- to-day work and in respect of the reporting requirements. Employees are expected to raise concerns with their manager.

## **10.0 References - Legislation**

- Crimes Act 1914 (Cth)
- Criminal Code Act 1995 (Cth)
- Fair Work Act 2009 (Cth)
- Migration Act 1958 (Cth)
- Modern Slavery Act 2018 (Cth)
- Modern Slavery Act 2018 (NSW)

**GCB Constructions Pty Ltd**