



Environmental Management Plan

CEN-HSE-PLN-291

Contents

1. Introduction and Purpose	4
2. Application and Scope	4
3. Operation Description	4
3.1 Sustainability (Climate Change)	4
4. Environmental Policy	5
5. Legal and Other Requirements	5
6. Management Framework	6
6.1 Roles and Responsibilities	6
6.2 Management Organisational Chart	7
6.3 Induction, Training, Awareness and Competency	8
7. Environmental Assessment	9
7.1 Environmental Aspects and Impacts	9
7.2 Potentially Significant Environmental Risks	11
7.3 Environmental and Sustainability Management Measures	11
7.3.1 Noise	11
7.3.2 Greenhouse Gas Management (GHGs)	11
7.3.3 Hydrocarbon Management	12
7.3.4 Waste Management	13
7.3.4.1 Third Party Controlled/Listed Waste	15
7.4 Environmental and Sustainability Monitoring	15
7.5 Environmental Performance Objectives	15
8. Document and Record Management	16
9. Reporting	16
9.1 Hazard & Incident Reporting – Internal	16
9.2 Hazard & Incident Reporting – External	17
10. Environmental Inspection and Audit	17
10.1 Internal Audits and Inspections	17
10.2 External Audits and Inspections	18
11. Maintenance Management Program	18
12. Emergency Response	18
13. Corrective and Preventative Action	18
14. Referenced Documents	19

Environmental Management Plan

15.	Terms and Definitions	20
16.	Document Control	20
16.1	Summary Information	20
16.2	Revision History	21

1. INTRODUCTION AND PURPOSE

The purpose of this Environmental Management Plan (EMP) is to define how Centurion identifies, manages and reduces its environmental impact and continuously improves its environmental performance.

2. APPLICATION AND SCOPE

This EMP outlines the procedures, arrangements and supporting tools used by Centurion to meet both legislative, regulatory, client and other obligations for environmental management and is applicable to all:

- Centurion sites and operations including offsite workplaces such as vehicles and activities conducted on public roads and client sites, except for Perth Airport.
- Workers and contractors working on our sites and subcontractors performing work on Centurion's behalf.

For the Perth Airport site, refer to CEN-HSE-PLN-216 – Environmental Management Plan – Perth Airport, which is designed to comply with and address requirements within the Perth Airport Pty Ltd Environmental Strategy.

3. OPERATION DESCRIPTION

Centurion's operations include receipting, storage, road transportation and distribution (long distance and local) of hazardous and non-hazardous products and internal plant and asset maintenance. Services also include central (off-site) storage, warehousing and freight forwarding. Service types include logistics, over dimensional, refrigerated, specialised bulk and heavy haulage transportation servicing general, retail, mining, and oil and gas customers.

3.1 Sustainability (Climate Change)

Centurion aims to be net zero by 2040, taking a scientific approach and working alongside our partners (OEMs), suppliers (technology providers) and clients to strive to eliminate greenhouse gas emissions as far as possible from our operations.

Sustainability Goals

- 100% Renewable Energy for offices, depots and branches by 2030.
- More than 80% of first/last mile delivery and materials handling, operating zero emission transport applications by 2030.
- All CFC Group businesses reaching at least a 50% reduction in transport fleet emissions intensity, achieved through renewable fuels or carbon offsets by 2030.

Initiatives being undertaken to meet the sustainability goals are:

- **Renewable Energy**
 - By 2030, 100% of all depots and branches will be operating from renewable electricity – achieved through onsite solar, renewable power purchase agreements or renewable energy generators.
- **Electric Vehicles (EV)**
 - First project in Australia to be powered by off-grid solar generation and battery energy storage.
 - 30 Mercedes-Benz eActros trucks to be introduced into Centurion's Perth Airport Depot fleet.

Environmental Management Plan

- Currently Centurion have 1 electric truck in Mackay and 20 electric forklifts, with those at Perth Airport powered by solar.
- **Route Optimisation**
 - Fleet and route optimisation using Machine Learning/AI techniques to plan pick-up and delivery (PUD) activities in the most efficient manner.
 - Fleet/Asset reduction by maximising vehicle utilisation for PUD activities.
 - Fuel reduction by determining optimised route to facilitate all PUD jobs for a given run.
 - Increased EV coverage by planning routes based on EV capabilities such as load capacities, distance and re-charge timings.
- **Other**
 - Signing onto Hydrogen fuelled transport program, in collaboration with Woodside Energy, BGC, and the Western Australian Government. Centurion plans to offtake Hydrogen from a groundbreaking self-contained hydrogen production, storage and refuelling station, in the Rockingham Industrial Zone.
 - Vehicle specific driver training.

4. ENVIRONMENTAL POLICY

Centurion maintains an Environmental Policy which details and promotes the Company's commitment to environmental protection and sustainability. The Policy is reviewed two yearly and endorsed by the CEO.

Centurion's environmental management system is certified to ISO 14001:2015.

The Environment Policy is communicated to workers through Centurion's induction process; it's displayed at all sites (HSEQ noticeboards) and is available on Centurion's website and in the Corporate Library.

5. LEGAL AND OTHER REQUIREMENTS

CEN-HSE-REG-1219 – HSEQ Legal and Other Obligations Register is maintained which identifies HSEQ legislation and other requirements applicable to Centurion's operations, including:

- Legislation
- Codes of Practice
- International/Australian Standards
- Other relevant/industry guidelines/ obligations.

The process for identification, access and compliance to legal and other requirements is detailed in CEN-HSE-PRO-209 – HSEQ Legal and Other Requirements Procedure. Identified legal and other obligations are monitored by the HSEQ team for updates; where required Centurion's HSEQ Management System and referenced processes are updated to reflect such changes.

CEN-HSE-REG-1219 – HSEQ Legal and Other Obligations Register is available in the Corporate Library; it contains a link to the web address for each document, where available, ensuring current versions can be readily accessed.

Australian and International Standards can be accessed via the Standards Australia online portal by request to HSEQ.

Changes to legal and other requirements are communicated via HSE Meetings and Toolbox Meetings.

Periodic verification of ongoing compliance to obligations is completed via workplace inspections, internal compliance audits, interactions and specific obligation checklists.

6. MANAGEMENT FRAMEWORK

6.1 Roles and Responsibilities

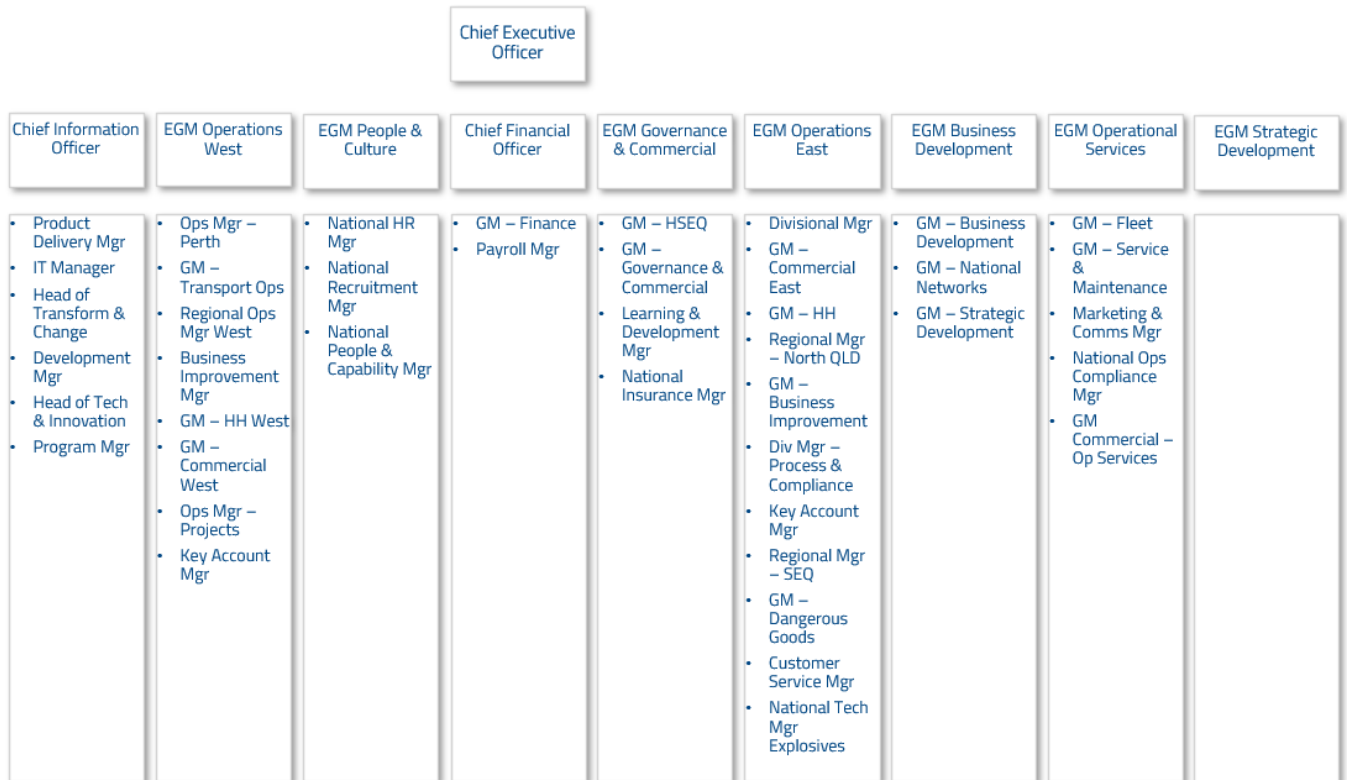
The effectiveness of Centurion’s environmental management processes relies on workers throughout the business ensuring that they fulfil their responsibilities. Responsibilities associated with Centurion’s ability to effectively manage environmental aspects and achieve its environmental objectives are defined:

Chief Executive Officer (CEO)	Overall responsibility for ensuring that Centurion has suitable and effective environmental management processes in place to comply with legal and other requirements. This may involve reporting on environmental management to the Board, as required.
Centurion Executive and Senior Leadership Team	<ul style="list-style-type: none"> • Ensure Centurion meets its legal and other requirements • Understand the environmental aspects and impacts relevant to the business • Monitor Centurion’s Environmental Performance • Allocate reasonable resources to implement environmental management processes and to achieve environmental objectives and targets • Lead by example
HSEQ Team	<ul style="list-style-type: none"> • Establish, implement and maintain environmental policy, environmental management plans and procedures • Keep up to date with legislative requirements and amendments • Communicate legislative requirements and amendments to relevant stakeholders and incorporate into environmental management processes and procedures, as required • Ensure all operational departments have identified and documented environmental aspects and impacts assessed • Monitor and report on environmental performance as required • Establish and maintain an internal auditing program to evaluate business compliance with the HSEQ management system and effectiveness of environmental processes • Work with Operations/ Branch Managers to establish and maintain suitable emergency response procedures, which include response to environmental incidents • Provide subject matter expert input into the development and review of relevant internal training programs (e.g., Induction package) covering aspects of environmental management
Operations/ Branch Managers	Responsible for compliance against defined environmental management processes by Operations within their area of responsibility, including: <ul style="list-style-type: none"> • Promote and enforce the Environmental Policy and applicable plans and procedures • Ensure environmental aspects are identified and impacts managed • Ensure all environmental hazards, incidents and complaints are recorded into Myosh, and suitable corrective/preventative actions are applied • Ensure health monitoring for workers is carried out, if required

Environmental Management Plan

	<ul style="list-style-type: none"> • Ensure workplace inspections are conducted • Maintain good standards of housekeeping • Ensure the emergency response plan is displayed in the workplace, and all workers are familiar with emergency response procedures • Maintain relevant emergency response equipment • Ensure appropriate storage and disposal of waste • Make all reasonable efforts to reduce and minimise emissions, waste and energy usage • Apply the reduce, reuse and recycle method • Ensure relevant workers are appropriately trained • Manage and supervise visitors and contractors
All Workers (incl. contractors performing work on Centurion’s behalf)	<ul style="list-style-type: none"> • Participate in Centurion induction training • Adhere to Environmental Policy and all relevant plans and procedures • Perform work in a manner that does not pose an unacceptable risk to the environment • Report identified environmental hazards and incidents to line manager as soon as possible • Stop work if you consider that if you continue to do so will impact the environment
Contracts Delivery Team	<ul style="list-style-type: none"> • Notify HSEQ Team of any new or changed client requirements relating to environmental management, which may include: <ul style="list-style-type: none"> ○ Environmental performance reporting KPIs ○ Changes to the nature of Centurion’s scope of work which may have environmental implications.

6.2 Management Organisational Chart



6.3 Induction, Training, Awareness and Competency

Induction and Awareness

Centurion uses the following forums to ensure that relevant workers throughout the business possess the required skills and knowledge, to identify and control environmental impacts, and to work in an environmentally responsible manner:

- Centurion's corporate induction is mandatory for all workers performing work on a Centurion site or on Centurion's behalf. The induction must be completed prior to the worker commencing work. The induction training package covers the following topics:
 - Centurion's Environmental Policy
 - Centurion's commitment to environmental preservation
 - Environmental risks, and where applicable, significant environmental aspects
 - Key responsibilities
 - Spill response management
 - The reduce, re-use, recycle process.
- The HSEQ Team, which consists of personnel with environmental experience, facilitates coaching and training sessions with Operations/ Branch Managers as required.
- Environmental information is communicated to workers as required, through HSE Meetings, Toolbox Meetings, HSEQ Alerts and HSEQ Noticeboards established at each site.
- Nominated workers in relevant areas of the business complete accredited Dangerous Goods training and are utilised as subject matter experts in the workplace to ensure hazardous substances and dangerous goods are stored, handled and transported in a manner which is safe to all people, equipment and the environment.

Centurion's induction program is detailed in CEN-PCT-PRO-803 - Induction, Training and Development Procedure.

Training and Competency

Job skills and competency requirements are identified for each applicable role, to ensure workers are trained and competent.

Ongoing assessment is undertaken to verify that skills are of a high standard; where gaps are identified additional training is provided to ensure that the worker meets the required job skill competencies.

Training needs are monitored by the Training Department.

A condition of employment and service provision to Centurion is that all workers, contractors and subcontractors must have current at all times, licences and competency assessments that pertain to their jobs.

A Training Matrix is maintained by the Training Department which contains all training qualifications required for each position, for workers to be able to perform their job safely and in an environmentally responsible manner. All training records are cross-referenced using the Training Matrix to determine any gaps pertaining to training and/or licencing requirements. Prior to mobilisation and commencement of a

Environmental Management Plan

particular task, a Training Matrix for each applicable position will be compiled to ensure all required competencies are met, or appropriate steps taken to ensure compliance.

Centurion’s training and competency program is detailed in CEN-PCT-PRO-804 - Verification of Competency Procedure.

7. ENVIRONMENTAL ASSESSMENT

Centurion’s risk management process is detailed in CEN-HSE-PRO-813 - Hazard and Risk Management Procedure.

7.1 Environmental Aspects and Impacts

Centurion identifies and controls environmental aspects associated with its activities through risk management processes. The risk assessment, which records adverse and beneficial impacts to the environment, as a result of Centurion’s operations and required controls, is documented using CEN-HSE-REG-1241 -Environmental Aspects and Impacts Register, which has been established for each site. Other risk assessment processes where environmental aspects may be identified include Job Hazard Analysis and Take 5’s.

Environmental aspects are elements of Centurion’s activities, products and services which interact with the environment. Examples of the types of interactions include:

- Air pollution through emissions
- Discharge into waterways
- Waste production
- Energy usage (e.g., electricity)
- Contaminating soil with hazardous chemicals (e.g., fuels, oils).

It is the responsibility of Operations/ Departmental Managers, in conjunction with the HSEQ Department, to complete and maintain an Environmental Aspects and Impacts Register for their area of responsibility. The process is detailed below:

Step	Procedure
1) Identify all environmental aspects	<p>Review the workplace and work activities for elements which do, or can, have an effect on the environment. consideration should be given to potential emergency situations, normal and abnormal operating conditions.</p> <p>Column A of the spreadsheet is pre-populated with the different types of aspects to prompt you to think of all potential impacts during the identification process.</p> <p>In columns B – D records:</p> <ul style="list-style-type: none"> • Which business area each aspect is produced by • How the activity does/could affect the environment; and • A description of the activity

Step	Procedure																								
	<table border="1"> <thead> <tr> <th>Aspect</th> <th>Business Area</th> <th>Potential Environmental Impact</th> <th>Activity</th> </tr> </thead> <tbody> <tr> <td>Air Pollution</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Water Pollution</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Soil Contamination</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Natural Resource Depletion</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Waste to Landfill</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Aspect	Business Area	Potential Environmental Impact	Activity	Air Pollution				Water Pollution				Soil Contamination				Natural Resource Depletion				Waste to Landfill			
Aspect	Business Area	Potential Environmental Impact	Activity																						
Air Pollution																									
Water Pollution																									
Soil Contamination																									
Natural Resource Depletion																									
Waste to Landfill																									
2) Assess the aspects	<p>Refer to CEN-HSE-FRM-445 - Risk Matrix to establish an inherent risk rating (without any control applied) for each aspect.</p> <p>Populate the Inherent Risk Ranking section (Columns E – G) by recording likelihood and potential consequence of the known or potential aspect and resulting risk ranking as per the Matrix. For example:</p> <table border="1"> <thead> <tr> <th colspan="3">Inherent Risk Ranking</th> </tr> <tr> <th>Likelihood</th> <th>Consequence</th> <th>Risk Ranking</th> </tr> </thead> <tbody> <tr> <td>Likely</td> <td>moderate</td> <td>High</td> </tr> </tbody> </table>	Inherent Risk Ranking			Likelihood	Consequence	Risk Ranking	Likely	moderate	High															
Inherent Risk Ranking																									
Likelihood	Consequence	Risk Ranking																							
Likely	moderate	High																							
3) Ensure each aspect is adequately controlled	<p>List all current controls applied to the aspect and repeat the risk ranking with consideration to these controls, to determine their effectiveness. Record this second risk ranking under 'Residual Risk Ranking' (columns I – K). For example:</p> <table border="1"> <thead> <tr> <th rowspan="2">Existing Controls</th> <th colspan="3">Existing risk ranking</th> </tr> <tr> <th>Likelihood</th> <th>Consequence</th> <th>Risk Ranking</th> </tr> </thead> <tbody> <tr> <td> <i>Spill kits maintained on site. Personnel trained in the use of spill kits. Hydrocarbon waste bins maintained on site. Oil separator maintained and emptied regularly. Oil separator alarmed. Oil separator in bunded area (2100L capacity). Stormwater isolation procedure.</i> </td> <td>likely</td> <td>minor</td> <td>Medium</td> </tr> </tbody> </table>	Existing Controls	Existing risk ranking			Likelihood	Consequence	Risk Ranking	<i>Spill kits maintained on site. Personnel trained in the use of spill kits. Hydrocarbon waste bins maintained on site. Oil separator maintained and emptied regularly. Oil separator alarmed. Oil separator in bunded area (2100L capacity). Stormwater isolation procedure.</i>	likely	minor	Medium													
Existing Controls	Existing risk ranking																								
	Likelihood	Consequence	Risk Ranking																						
<i>Spill kits maintained on site. Personnel trained in the use of spill kits. Hydrocarbon waste bins maintained on site. Oil separator maintained and emptied regularly. Oil separator alarmed. Oil separator in bunded area (2100L capacity). Stormwater isolation procedure.</i>	likely	minor	Medium																						
4) Establish proposed actions	<p>Additional controls should be established if:</p> <ol style="list-style-type: none"> current control measures do not reduce the risk to an acceptable level; or opportunity exists to further improve management of a particular aspect: <p>These additional controls are to be recorded under Proposed Actions.</p>																								

The Operations/ Branch Managers, in conjunction with the HSEQ Department must ensure that the Environmental Aspects and Impacts Register, relating to their operations remains relevant, up-to-date and effective; this is achieved through annual review:

- Verify environmental aspects and controls listed are current
- Review risk ratings and effectiveness of current controls, considering such factors as:
 - Current legal, client and other requirements
 - Capability of existing resources
 - Environmental incidents reported since the last review
 - Centurion’s environmental performance since the last review
 - Cost of effective control measures.
- Determine completion of proposed actions since the last review; proposed actions which have been completed are to be transferred into Existing Controls.

- Identify any new opportunities to mitigate environmental impacts and record under proposed actions; and enter into Myosh.

The Environmental Aspects and Impacts Register will also be reviewed where there is a change to Centurion's scope of work, as per management of change processes.

7.2 Potentially Significant Environmental Risks

Any event that causes harm to the environment that cannot be immediately recovered is deemed significant. For Depot operations, identified significant environmental events are:

- A loss of containment to air, water or land (such as an uncontrolled discharge of a hazardous material or wastewater that has entered drains of the natural environment or unplanned release to air)
- Fire
- Natural disaster.

The site emergency response plan includes emergency response procedures to address significant environmental incidents.

7.3 Environmental and Sustainability Management Measures

7.3.1 Noise

Noise production is a potential environmental concern, as it can disrupt the acoustic environment of surrounding fauna, and residential and commercial neighbours. Despite Centurion operations utilising various forms of freight moving vehicles and pneumatic hand tools, there are no confirmed noise exposure risks. Supporting reasons include:

- Noise produced is largely contained within the confines of warehouses/ workshops; and
- Vehicle movement is a consistent, low producer of noise.

7.3.2 Greenhouse Gas Management (GHGs)

GHGs are those that directly contribute to the greenhouse effect by absorbing infrared-radiation. Carbon Dioxide (CO₂), Methane (CH₄), Nitrous Oxide (N₂O) and Ozone (O₃) are the main GHGs emitted that contributes to this effect. Centurion naturally emits GHGs through the burning of petroleum fuels through its transport operations and is committed to identifying opportunities to reduce pollution and improve sustainability within its operations.

Examples of how Centurion manages and strives to improve its emission of GHGs include:

- Maintaining and monitoring an inventory of our emissions
- Annual reporting of emissions to the NGER Scheme, which is completed by the Governance and Commercial team
- An Environmental Policy committing to continuous improvement in our energy efficiencies
- New prime movers purchased to meet Euro 6 emission standards
- Utilisation of LPG and electric forklifts (non-fuel powered)

- Vehicle and equipment maintenance program to optimise asset operating integrity and minimise GHG emissions
- Sustainability measures as detailed in Section 3.1

7.3.3 Hydrocarbon Management

Hydrocarbons are organic chemical compounds composed of Carbon and Hydrogen elements. Hydrocarbons are the principal component of petroleum and natural gas and are present in lubricants and oils utilised for general operations at Centurion. Key operations in Centurion with an inherent risk of hydrocarbon release include:

- Refuelling powered mobile plant, vehicles and equipment
- Hydraulic hose failure and other mechanical failure
- Hydrocarbon transport and storage.

Hydrocarbon spills are of high environmental concern due to the high toxicity to natural ecosystems which suffocate plant life and contaminate waterways. Appropriate hydrocarbon storage, disposal and spill prevention measures are critical to minimise the risk of environmental pollution.

Storage of Hydrocarbons

All Hydrocarbons must be stored in a manner that meets legislative and AS 1940:2017 The storage and handling of flammable and combustible materials. Requirements include but are not limited to:

- Only store hydrocarbons in designated areas, which are bunded and away from watercourses and drains
- Storage areas are to be well ventilated
- Safety Data Sheet (SDS) for each substance is to be readily available and clearly identifiable
- Hydrocarbons (combustible and flammable materials) are to be separated from boundaries, protected places and accumulations of combustible materials
- Flammable materials to be isolated from ignition sources e.g., flames, sparks, hot surfaces
- If more than 1000L of combustible liquids or 100L of flammable liquids are stored, at least 1 fire extinguisher must be maintained nearby
- Spill kits must be readily available.

Oil Separators

Oil separators must be regularly maintained, which is to include the disposal of any waste oil in the tank and inspection of the integrity of the tank.

Wash Bay Tank

Wash bays are utilised at a number of Centurion sites to ensure our fleet remains clean and importantly, hygienic for transporting consumables. Water tanks capture the wash bay runoff/

wastewater and rainwater, which is recycled. Mains water is used to top up the system, as required.

Remnant hydrocarbons that are present within the wash bay wastewater, from the cleaning of vehicles which have residual hydrocarbons on them, are collected in the wash bay wastewater tank, no water is disposed in the main sewer. The wash bay wastewater tanks are emptied, as required, by a licensed waste disposal contractor and disposed of at an approved facility.

Rainwater tank maintenance is to be undertaken 6-monthly and internal water quality testing is completed three monthly, for pathogens (viruses, bacteria and protozoa) which may be present within the tank and any identified pathogens rectified.

7.3.4 Waste Management

Different waste types are produced through Centurion operations. Incorrect waste disposal can result in groundwater, surface water or soil contamination, vegetation or fauna impacts, poor visual amenity or health and safety issues. It is therefore important for managers to understand the different waste types, the correct methods of storing/disposing of each waste type and to enforce the correct practices through their area of responsibility.

Waste types and their corresponding waste management methods include:

Type of Waste	Examples	On site Waste Management
General	Plastic, cans, glass, food wrapping and scraps	<ul style="list-style-type: none"> Place in general waste bulk or wheelie bins (red lid). Place recyclables in recycling bin (yellow lid) where possible.
General – Office	Paper, cardboard, printer ink/toner cartridges, batteries	<ul style="list-style-type: none"> Place recyclables in recycling bin (yellow lid) where possible or secure destruction (blue bin) where required (e.g., confidential or commercially sensitive)
Scrap (metal)	Welding rods/crucibles	<ul style="list-style-type: none"> Place in designated scrap metal bin
Scrap (wood)	Pallets	<ul style="list-style-type: none"> Place in designated wood recycling area
Hydrocarbons	Engine oil, lubricants, solvents, oily rags	<ul style="list-style-type: none"> Place in bin (usually black) marked 'hydrocarbon'
Batteries	Industrial e.g., truck Consumable e.g., AAA	<ul style="list-style-type: none"> Place on designated banded pallet Place in battery bin
Tyres		<ul style="list-style-type: none"> Store in designated area; no more than 100 used tyres permitted on site.

All of the above waste types are collected and disposed of by an appropriately licensed waste disposal contractor. Centurion’s contract management processes ensure any contractors used for the collection

and disposal of waste must provide a valid waste disposal licence, as proof they are authorised to do so. Proof of responsible disposal is obtained.

All Centurion workers, contractors and subcontractors are trained in correct waste management and spill kit use through the Centurion induction process, which also covers the Reduce, Reuse and Recycle initiative.

Waste streams, as well as their respective collection and disposal methods are detailed in the Environmental Impacts and Aspects Register. Waste identified includes but is not limited to, waste oils, solvents, oily water mixtures, empty hydrocarbon drums, oil filters, oily rags, tyres, cartridges, vehicle batteries, lightbulbs, e-waste, bio-waste, plastics, sheet metal and general waste.

The Reduce, Reuse, Recycle Initiative

The reduce, reuse, recycle initiative is a proactive recycling initiative designed to change habits and develop new practices aimed at reducing waste and protecting the environment:

REDUCE	<p>How can I use less or produce less waste?</p> <p>The first priority is to reduce the amount of waste being produced. This is to reduce GHGs, the demand on natural resources and associated costs. Examples include:</p> <ul style="list-style-type: none"> • Using energy saving light globes • Installing skylights and Perspex sheeting on a roof to introduce more natural light and reduce the need for electrical lighting • Installing solar technologies that convert sunlight into electrical energy either through photovoltaic (PV) panels or through mirrors that concentrate solar radiation. • Adopting a paper-free operation • Using re-usable drinking cups and bottles, removing the need for single use, disposal products such as polystyrene cups
REUSE	<p>Can I or someone else reuse this item?</p> <p>Reuse is the second priority. Where possible, reuse materials and waste products to decrease the amount of waste being sent for recycling, landfill or incineration. Centurion examples include reusing:</p> <ul style="list-style-type: none"> • Plastic packaging from opened packages as wrapping for new packages • Wooden pallets • Large metal drums for storage and waste • Reusing/ re-treading tyres
RECYCLE	<p>Can I put this in recycling or turn it into something else?</p> <p>Waste produced at Centurion is recycled and repurposed by authorised contractors, where possible. Recycling is an important initiative for reducing waste sent to landfill and incinerators, the conservation of natural resources, and significantly reducing pollution and energy consumption.</p>

	Colour-coded waste recycling bins are labelled to facilitate segregation of different materials for successful recycling. (Refer Waste Management table in section 7.3.4).
--	--

Where practicable, all Centurion sites are expected to adopt the following waste/pollution reduction initiatives:

- Utilise energy saving lightbulbs
- Encourage a paper-free workplace
- Reduce the need for colour printing
- Utilise material recycling programs.

7.3.4.1 Third Party Controlled/Listed Waste

Centurion does not store any third party generated controlled/listed waste. Centurion exclusively engages in the collection and transport of controlled/listed wastes to an approved controlled/ listed waste facility.

Controlled/ listed waste types transported, are in accordance with the Environmental Protection Licence issued by the State/ Territory environmental protection authority.

Common types of controlled/listed waste transported include acidic solutions or acids in solid form, containers that are contaminated with residues of a listed/controlled waste, tyres, waste mineral oils unfit for their original intended use, waste mixtures, or waste emulsions, of oil and water or hydrocarbon and water.

For emergencies involving the transport of controlled/listed waste, refer to CEN-HSE-PLN-284 -Transport Emergency Response Plan.

7.4 Environmental and Sustainability Monitoring

Centurion does not undertake any activities which require environmental monitoring, from a regulatory perspective.

7.5 Environmental Performance Objectives

At the commencement of each new financial year Centurion publishes an HSEQ Strategic Plan, which lists the strategic HSEQ projects to be achieved within the year and the company wide HSEQ KPIs. KPI's relating to the environment include:

- Critical Incident Frequency Rate
- Critical Risk Interactions
- Critical Risk Assessments
- Overdue Incident Investigations
- Overdue Actions
- HSE Toolbox Meetings
- Workplace Inspections

Performance against KPIs is communicated weekly at operational HSE Meetings attended by management and the HSEQ Board Report.

Further information on monitoring HSEQ performance and how to track progress is detailed in CEN-HSE-PLN-764 - HSEQ Objectives and Targets Plan.

8. DOCUMENT AND RECORD MANAGEMENT

CEN-QAL-PRO-921 - Document Control Procedure and CEN-QAL-PRO-323 - Record Management Procedure outline the control processes for documents, data and records, including the review, approval, issue and change of all HSEQ documentation, types of records to be retained and the requirements for controlling these records.

All HSEQ documents are managed using the Master Document Register and are published in the Corporate Library, where they are readily available for workers to access.

9. REPORTING

9.1 Hazard & Incident Reporting – Internal

All Centurion workers, contractors and subcontractors are trained in their responsibility to identify and report environmental hazards and incidents to their line manager in a timely manner, as part of the induction process. This is to include any actual or suspected hazard or incident (e.g., chemical spills, excessive dust etc).

All hazards and incidents, including complaints must be recorded in Myosh by the relevant Manager, as per CEN-HSE-PRO-148 - Incident Investigation and Management Procedure.

The environmental report template in Myosh will prompt a user to list specifics of the environmental incident including the area affected, cause, type of environmental incident (refer to table below), nature of the impact, contaminant, impact area etc. The information is used by the HSEQ Team to determine whether the incident is reportable and to identify trends.

Environmental Hazard Type	Definition
Severe weather	Any dangerous meteorological phenomena that has the potential to damage property or assets and threaten human life
Earthquake/ Subsidence	Any movement of the earth's surface
Emission of gas/vapour/mist/aerosol	Any gas, vapour, mist or aerosol that is released out into the open
Spills of liquid	An accidental release or flow of a liquid
Spills of solid	An accidental release or flow of a solid
Seepage of liquids to ground	A slow escape of a liquid through a material
Biological hazard	Organic substances that pose a threat to human health, including pathogenic microorganisms, viruses, toxins, fungi, bio-active substances and introduction of species

Criminal action	An act that is harmful to individuals, communities, society or the state, punishable by law e.g., illegal dumping
Stormwater runoff and flooding	
Heavy rain/hail	

Incident severity is classified based on the CEN-HSE-FRM-445 - Risk Matrix. All incidents are investigated, the methodology used (e.g., 5 Why or ICAM) is based on the incident actual severity or maximum reasonable outcome.

Corrective/preventative actions assigned to the hazard/incident/ complaints will be managed through Myosh, as detailed in Section 13.

9.2 Hazard & Incident Reporting – External

Significant environmental incidents must be reported to the appropriate external authority, as per regulatory provisions or lease conditions. External reporting is facilitated by a member of the HSEQ Team. Externally reportable incidents are indicated by selecting the ‘External Reportable’ option within the Myosh Incident Report form.

Community complaints are actioned as per 9.1.

10. ENVIRONMENTAL INSPECTION AND AUDIT

Centurion’s audit and inspection programs are detailed in CEN-QAL-PRO-414 - Audit Management Procedure and CEN-HSE-PRO-1101 - Workplace HSE Inspection Procedure, respectively.

10.1 Internal Audits and Inspections

Centurion’s HSEQ management system includes an internal audit program. An integrated HSEQ audit tool is utilised by audit-qualified personnel, to proactively assess compliance to management system standards, in line with the Audit Schedule and to identify non-conformances/ areas of improvement which need to be rectified.

Monthly workplace inspections are conducted at all Centurion sites, incorporating a number of health, safety, wellbeing, quality and environmental management aspects. The inspections are completed using the inspection module in Myosh.

Workplace inspections are facilitated through the Branch/ Operations Manager; it requires a physical walk around of the site to visually inspect all criteria listed in the checklist.

For environmental aspects, these inspections are designed to:

- Proactively identify environmental aspects and impacts
- Verify that Centurion processes have been correctly implemented
- The processes are effective

Any audit and inspection actions will be managed through Myosh, as detailed in Section 13.

10.2 External Audits and Inspections

Third party certification and/or surveillance audits are conducted yearly to assess Centurion's compliance to the International Standard ISO 14001 Environmental Management Systems. Centurion Perth Airport is audited annually, audits of all other Depots are based on a three-year sample plan.

Centurion may also be subject to external inspections conducted by the relevant State/ Territory Environmental Protection Authority (EPA), Council or Lessors, to assess compliance to relevant environmental obligations. Centurion will cooperate with all such requests.

External audit and inspection findings are managed using Myosh.

11. MAINTENANCE MANAGEMENT PROGRAM

Centurion workshop maintenance and facilities maintains or manages the maintenance of the Company's physical assets, to ensure the assets capacity to deliver required function and performance throughout its planned operating life. The physical asset and the maintenance systems are inspected and audited regularly to ensure compliance with Company procedural requirements, legislative requirements and OEM requirements. Maintenance procedures are documented in the CEN-AMM-MAN-126 - Mobile Equipment Maintenance Manual. Testing and inspection plans are documented in the CEN-QAL-MAN-163 – Quality Manual.

Refer to Section 7.3 for detail on inspection and maintenance requirements for critical equipment in mitigating environmental impacts e.g., oil separators, wash bay tanks.

12. EMERGENCY RESPONSE

Centurion has identified potential environmental emergency scenarios relating to operations through the risk assessment and management of change processes, as well as through previous incidents and experience.

Potential environmental emergency situations identified include, but are not limited to:

- Spills of hazardous chemicals or controlled waste (either on site or during transit)
- Natural disasters (such as cyclones, floods, bush fire)
- Contamination of waterways
- Identification of fauna (e.g., snakes) in the workplace.

Required emergency response resources and equipment are determined by the EPC and ECO. All emergency response equipment is inspected monthly, as per CEN-HSE-FRM-767 - Monthly Workplace HSE Inspection.

Emergency response exercises are completed annually, as a minimum at each Depot.

Further information on emergency response procedures and planning is detailed in the Site Emergency Response Plans (Various), CEN-HSE-PRO-842 – Spill Response Procedure, CEN-HSE-PRO-1239 – Adverse Weather Procedure, CEN-HSE-PRO-415 – Cyclone Procedure and CEN-HSE-PLN-284 -Transport Emergency Response Plan.

13. CORRECTIVE AND PREVENTATIVE ACTION

Any corrective/preventative actions identified through hazard identification, incident investigations, complaints, audits, inspections, management of change etc are to be entered and managed using Myosh. Each action will

have an assigned responsible person and due date, as well as an assigned accountable manager (who is provided oversight of the action and completion status).

14. REFERENCED DOCUMENTS

Referenced document
AS 1940:2017 The storage and handling of flammable and combustible materials
Emergency Response Plan
ISO 14001:2015 Environmental Management Systems
Master Document Register
CEN-AMM-MAN-126 - Mobile Equipment Maintenance Manual
CEN-HSE-FRM-445 – Risk Matrix
CEN-HSE-PLN-284 - Transport Emergency Response Plan
CEN-HSE-PLN-764 - HSEQ Objectives and Targets Plan
CEN-HSE-PRO-148 - Incident Investigation and Management Procedure
CEN-HSE-PRO-209 – HSEQ Legal and Other Requirements Procedure
CEN-HSE-PRO-415 – Cyclone Procedure
CEN-HSE-PRO-813 – Hazard and Risk Management Procedure
CEN-HSE-PRO-842 – Spill Response Procedure
CEN-HSE-PRO-1101 - Workplace Inspection Procedure
CEN-HSE-PRO-1239 – Adverse Weather Procedure
CEN-HSE-REG-1219 – HSEQ Legal and Other Obligations Register
CEN-HSE-REG-1241 -Environmental Aspects and Impacts Register
CEN-QAL-MAN-163 – Quality Manual
CEN-QAL-PRO-323 - Record Management Procedure
CEN-QAL-PRO-414 - Audit Management Procedure
CEN-QAL-PRO-921 - Document Control Procedure
CEN-PCT-PRO-803 - Induction, Training and Development Procedure
CEN-PCT-PRO-804 - Verification of Competency Procedure
CEN-HSE-PLN-240 - Emergency Response Plan - Kalgoorlie
CEN-HSE-PLN-241 - Emergency Response Plan - Rocklea
CEN-HSE-PLN-242 - Emergency Response Plan - Mackay
CEN-HSE-PLN-243 - Emergency Response Plan - Darwin
CEN-HSE-PLN-244 - Emergency Response Plan - Karratha
CEN-HSE-PLN-245 - Emergency Response Plan - Emerald
CEN-HSE-PLN-246 - Emergency Response Plan - Carnarvon
CEN-HSE-PLN-247 - Emergency Response Plan - Broome
CEN-HSE-PLN-248 - Emergency Response Plan - Kununurra
CEN-HSE-PLN-249 - Emergency Response Plan - Newman
CEN-HSE-PLN-250 - Emergency Response Plan - Port Hedland
CEN-HSE-PLN-479 - Emergency Response Plan - Albany
CEN-HSE-PLN-1511 - Emergency Response Plan - Heavy Haulage Kewdale
CEN-HSE-PLN-1264 - Emergency Response Plan - Redbank
CEN-HSE-PLN-1348 - Emergency Response Plan - Yarwun
CEN-HSE-PLN-1365 - Emergency Response Plan - Helidon
CEN-HSE-PLN-1391 - Emergency Response Plan - Newcastle
CEN-HSE-PLN-1405 - Emergency Response Plan - Dubbo
CEN-HSE-PLN-1431 - Emergency Response Plan - Rockhampton Power Street

Referenced document
CEN-HSE-PLN-1446 - Emergency Response Plan - Gracemere
CEN-HSE-PLN-1560 - Emergency Response Plan - Wingfield
CEN-HSE-PLN-1589 - Emergency Response Plan - Alice Springs Ghan Road
CEN-HSE-PLN-1590 - Emergency Response Plan - Alice Springs Stuart Highway
CEN-HSE-PLN-1591 - Emergency Response Plan - Cavan
CEN-HSE-PLN-1595 - Emergency Response Plan - Cloncurry
CEN-HSE-PLN-1604 - Emergency Response Plan - Mount Isa
CEN-HSE-PLN-1732 - Emergency Response Plan - Melbourne

15. TERMS AND DEFINITIONS

Term	Definition
ECO	Emergency Control Organisation
EMP	Environmental Management Plan
Environment	Includes all aspects of the surroundings of human beings including: <ol style="list-style-type: none"> the physical characteristics of those surroundings such as the land, the waters and the atmosphere; and the biological characteristics of those surroundings such as the animals, plants and other forms of life; and the aesthetic characteristics of those surroundings such as their appearance, sounds, smells, tastes and textures.
Environmental Aspect	Element of an organisation's activities or services that interacts or can interact with the environment.
Environmental Impact	Change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's environmental aspects.
EPA	Environmental Protection Authority
EPC	Emergency Planning Committee
EV	Electric Vehicle
Health Monitoring	Monitoring of a worker to identify changes in their health status because of exposure to certain substances. It involves a registered medical practitioner with experience in health monitoring to examine and monitor the health of your workers to see if the exposure to hazardous chemicals at work is affecting their health.
OEM	Original Equipment Manufacturer

16. DOCUMENT CONTROL

16.1 Summary Information

Aspect	Details
Document Name	Environmental Management Plan
Document Reference	CEN-HSE-PLN-291
Document Owner	Sharon Huzzard
Published Date	15/08/2024
Next Revision Date	15/08/2025
Classification	Internal
Developed by	Sharon Huzzard

16.2 Revision History

Revision	Date	Changes
9.0	11/08/2022	Comprehensive review to reflect current practice, removed Perth Airport detail – refer to CEN-HSE-PLN-202
10.0	31/07/2023	Added organisational chart and updated references
11.0	14/08/2024	Updated sustainability goals and added third party controlled/ listed waste