PLAN

Title:	**Environmental Management Plan**

DOCUMENT CONTROL

Doc. Reference	PL-AUS-HSEQ-006	**Function**	HSEQ
Creation Date	07/02/2017	**Group Owner**	HSEQ Manager Australasia
Rev. Number	003	**Group Approver**	Group Head of HSEQ
Rev. Date	20/08/2021		

APPROVED VARIANCE

To comply with Australian rules and regulations and shall be reviewed in conjunction with GOP-HSEQ-014 Environmental Review

APPLICABILITY

This document is relevant to all ASCO personnel.

SAFETY CRITICAL

There are no safety critical tasks within this plan.

DOCUMENT REFERENCES

Internal References	• ERP-AUS-HSEQ-xxx Emergency Response Plans - Site Specific • FRM-GOP-HSEQ-031.01 Incident Notification Form • FRM-GOP-HSEQ-031.07 Incident Report • FRM-GOP-HSEQ-042.02 Audit Schedule • FRM-GOP-HSEQ-014.01 - Environmental Review Verification • FRM-WA-GOP-TRAN-004.13.05 Lighting Tower Checklist • GOP-TDC-001 Competency Assurance Management System • GOP-HSEQ-30 Contractor Assessment and Risk Evaluation - CARE • GOP-HSEQ-014 Environtmental Review • GOP-HSEQ-017 External Audit • GOP-HSEQ-019 Hazard Identification and Control • GOP-HSEQ-031 Incident Management • GOP-HSEQ-032 Internal Audit • GOP-HSEQ-033 Verification • GOP-HSEQ-034 LiveSafe HSEQ Scorecard and Recording • GOP-HSEQ-035 LiveSafe Interventions • GOP-HSEQ-036 Management of Change • GOP-HSEQ-037 Management of Contractors • GOP-HSEQ-027 HSEQ Management Review • GOP-HSEQ-041 Permit to Work • GOP-HSEQ-045 Health, Safety and Environmental Legislative Compliance • GOP-HSEQ-046 Service Improvement Process (SID) • GOP-HSEQ-047 Task Based Risk Assessment (TBRA) • PL-AUS-HR-004 Human Resources and Industrial Relations Management Plan • PL-AUS-HSEQ-03 Training Management Plan • POL-HSEQ-03 ASCO HSEQ Policy Statement • WA-GOP-HSEQ-028.01 Reward and Recognition Australia • Training Matrix (on-line MyOSH Database)
External References	• Australian Dangerous Goods Code (ADGC) • Code of Practice for the Safe Transport of Radioactive Material, regulated by the Australian Radiation Protection and Nuclear Safety Agency and NP 087 Transport of Radioactive Materials.

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	• Codes of Practice and State / Territory Regulations • Environmental Protection Biodiversity Conservation Act 1999 • Wildlife and Conservation Act 1950
DOCUMENT SCOPE	
The purpose of this document is to implement and maintain an environmentally compliant work place for the planning and execution of its Scope of Services.	

REVISION HISTORY		
Rev	Date	Comment
001	07/02/2017	Creation of procedure
002	20/08/2018	Amend to to new document template
003	20/08/21	General Review

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Contents

1.0 Purpose

This Environmental Management Plan (EMP) describes the ASCO process and procedures for implementing and maintaining an environmentally compliant work place for the planning and execution of its Scope of Services to Shell Australia. The Scope of Work (SoW) is broadly summarised as the provision of managed supply chain solutions for Client. Key services include:

- Supply Base Operations (Darwin Onshore Supply Base – DOSB).
- Warehouse, Yard and Operations and Inventory Management.
- Domestic Transportation (Land, Air and Rail).
- Marine Supply Base Services (Darwin Marine Supply Base – DMSB).
- Facilities Management (DOSB).

Camp Facilities

This EMP will describe ASCO's Environmental requirements that shall be met through the utilisation of the ASCO Integrated Management System (AIMS). AIMS is detailed in the Policy section of this EMP.

This EMP will clearly demonstrate how ASCO will:

- Achieve the safe delivery of services.
- Implement its Environmental Management System.
- Meet the intent and specific requirements of the EMP

2.0 Currency and application of this EMP

This EMP is a live document available on the ASCO Intranet (http://intranet/AIMS)

3.0 Definitions

Term	Meaning
AIMS	The AIMS (ASCO Integrated Management Systems) Manual is the top level document for all ASCO Group companies. It shall set the minimum standards, which shall provide ASCO personnel with guidance in meeting the principles of good business management.
Business Unit Manager	Base Managers
Business Units	Darwin Marine Supply Base, Logistics Base1, Perth Supply Base, Dampier Supply base, Dongara Base
Controlled Sites	Work sites or locations at which ASCO Operational and/or Safety Management Systems are designates
Aspect	A situation with potential for human injury, damage to property or the environment, discharge of potential pollutants into the environment or some combination of the three
HAZID	Aspect Identification Workshop, carried out prior to major work activities to assist with identifying associated aspects and applying the hierarchy of control to reduce the impacts ALARP.
Incident	Any unplanned uncontrolled event that causes or has the potential to cause injury or illness to people, damage to plant, equipment or the environment, or loss. An incident is categorised by its outcome or potential for an outcome.
Impact	The effect of uncertainty on objectives. For Safety this is often measured by likelihood and consequence as explained in AS/NZS 31000:2009
Safety	Safety with a capital S includes Occupational Health

Safety Case	A set of documents required under the respective legislation, containing a Facility description, a Formal Safety Assessment and a Safety Management System.
Safety Management Plan	A document describing a party's process and procedures for implementing and maintaining a safe work environment while executing the defined scope of work. An SMP may incorporate the bridging document if applicable and may be a safety case or report or form part of a safety case or report
Senior Management Team	Consists of RMT and BMs
Shall/Must	A mandatory requirement
Should	A recommended requirement
Workforce	All personnel working at a facility or work site

Term	Meaning
AIMS	ASCO Integrated Management System
ALARP	As Low As Reasonably Practicable as applied to impact management
BM	Business Unit Manager
BOSIET	Basic Offshore Safety Induction and Emergency Training
BU	Business Unit
CEO	Chief Executive Officer
CMP	Communications Management Plan
DO	Director Operations
ERP	Emergency Response Plan
EMP	Environmental Management Plan
EMS	Environmental Management System
HRM	Human Resources Manager
IR/ER	Industrial Relations / Employee Relations
PPE	Personal Protective Equipment
RMT	Regional Management Team
MSDS	Safety Data Sheet
SMP	Safety Management Plan
SMS	Safety Management System
SMT	Senior Management Team
SoW	Scope of Work
SWL	Safe Working Load
TBRA	Task Based Risk Assessment

4.0 Environmental Management System Framework

ASCO's Environmental Management System (EMS) consists of the following elements:

- Legal Requirements and Regulations for Environmental Management.
- Leadership and Responsibility.
- Policies and Procedures.
- HSE Targets / Objectives.
- Organisation and Key Personnel.
- Aspect Identification, Impact Assessment and Impact Control.
- Operations Management and Commitment.
- Inspection & Audit Program.
- Training and Competency.
- Workforce Involvement and Engagement.

Information Management and Document Control.
- Asset Integrity.
- Management of Change.

- Emergency Preparedness and Response.
- Contractor Management.
- Procurement and Materials.
- Incident Reporting and Investigation.
- Health and Fitness.
- Statistics and Analysis.

The ASCO EMS is underpinned by both ASCO Values and Client 12 Life Saving Rules.

OUR VALUES

Our values define who we are, what we stand for and what we offer our clients.

They're the DNA of our business.

Together they shape our company and the behaviours we aspire to.

Work safe and live safe
We never compromise on safety. Ever. It's that simple. We have a good track record. And we intend to keep it.

Be your best
Nobody's flawless. But we do expect 100% from everyone.

Give clients the best
Looking after clients is fundamental to our business. We aim to give our clients the best – each day, every day.

Bring out the best in others
Our business brings together many talents. And it's up to all of us to recognise, nurture and celebrate those talents.

Life-Saving Rules

Work with a valid work permit when required	Conduct gas tests when required	Verify isolation before work begins and use the specified life protecting equipment	Obtain authorisation before entering a confined space	Obtain authorisation before overriding or disabling safety critical equipment	Protect yourself against a fall when working at height
1	2	3	4	5	6
7	8	9	10	11	12
Do not walk under a suspended load	Do not smoke outside designated smoking areas	No alcohol or drugs while working or driving	While driving, do not use your phone and do not exceed speed limits	Wear your seat belt	Follow prescribed Journey Management Plan

Asco will ensure that:

All Personnel have been briefed on the requirements of Client Life Saving Rules and the consequences of Life Saving Rules violations. ASCO will at Client request provide records of such briefings and ASCO Personnel covered.

- ASCO will report any violation of Client Life Saving Rules by ASCO Personnel to Client Representative immediately.
- ASCO will investigate all cases of Client Life Saving Rules violations and provide Client with the details of such investigations and consequence management actions taken. Client reserves the right to review and amend Terms of Reference for such investigations, nominate Client or third party staff to participate in such investigations.
- ASCO will demonstrate that consequence management has been applied to individuals that violated Client Life Saving Rules, based on the results of the relevant incident investigation. Client reserves the right to remove such individuals from the scope of this Contract. ASCO is responsible to provide adequate replacements for such individuals at no cost to Client.

5.0 Legal Requirement and Regulations for Environmental

As required by law, ASCO Policies and Procedures and/or respective Client Contracts; ASCO shall comply with all legally applicable environmental laws and regulations together with any additional and relevant guidelines, standards and codes.

ASCO Management, Supervisors and Personnel shall take all necessary precautions related to or arising out of the performance of the Services in order to protect themselves and property of ASCO, Client and third parties.

ASCO shall ensure that its personnel and/or its sub-contractors are fully informed of and comply with all such laws or regulations, statutory requirements and any additional guidelines, operating standards or codes including those

of Client. This is detailed in the Operations Management, Training and Competency and Sub-contractor Management sections of the EMP.

If any of ASCO's personnel or sub-contractors violates any such rule, regulations or other such requirement, ASCO shall as soon as reasonably practical correct and implement preventative measures to avoid recurrence. ASCO shall also immediately report (verbally and in writing) of any such violations to the nominated Client Representative.

In the event of a conflict between this EMP and applicable legal and regulatory requirements, the applicable legal and regulatory requirements shall be followed. If this EMP creates a higher obligation, it shall be followed as long as full compliance with applicable legal and regulatory requirements is also achieved.

The following AIMS procedures are to be utilised:
- GOP-HSEQ-045 Health, Safety and Environmental Legislative Compliance
- GOP-HSEQ-033 Verification

ASCO Australia's Legal Register is available online.

6.0 Leadership and Responsibility

6.1 Environmental Leadership

ASCO demands (and acknowledges Client's expectations for) strong Environmental Leadership from its Key Personnel to continuously and consistently drive safety behavioural to ensure that we continually:
- Provide a safe and healthy workplace environment for its workforce.
- Meet the Environmental standards expected from its Client, industry, community and Government
- Operate at all times to the standards set out within AIMS, Environmental Policies and Procedures (and or Contractors reviewed and accepted Environmental Management Systems as appropriate).

All levels of ASCO Management will demonstrate their leadership of Environmental standards by the following means:
- Promoting a positive HSEQ Culture at all levels within the organisation, specifically:

  o Ensuring that they always lead by example, by following or exceeding the ASCO Environmental and quality standard as laid out within the AIMS framework and this EMP.
  o Ensuring that management decisions are consistent with ASCO stated policy and objectives.
  o Placing HSEQ matters at the top of the agenda for all meetings.
  o Recognising and rewarding HSE achievement.
  o Ensuring that HSEQ responsibilities, authorities, accountabilities and competencies in relation to the Scope of Services are clearly defined, documented, communicated and exercised at all levels.
- Ensuring that there is an effective organisation structure to manage HSEQ duties and responsibilities for all BUs.
  o Ensuring effective communication on HSEQ issues at all levels within the organisation, specifically:
  o Engaging in open dialogue on all HSEQ issues with ASCO personnel, sub-contractors and its Client.
  o Ensuring that all ASCO and sub-contractor personnel are fully briefed on Environmental expectations and understand and strictly adhere to all ASCO regulations, standards and guidelines.
  o Sharing lessons learnt both internally and externally.
- Measuring and monitoring the HSEQ performance of ASCO and sub-contractors, specifically:
  o Participating in the review of HSEQ performance against agreed HSEQ plans, targets and objectives.
  o Conducting regular site visits and formal site inspections to all ASCO BUs and Controlled Sites.
  o Conduct regular site visits/audits to all CARE approved sub-contractors utilising the GOP-HSEQ-30 CARE audit programme.

○ Conducting regular internal and external audits.

6.2 Environmental Management Commitment at the Worksite

All ASCO leaders are to demonstrate exemplary environmental leadership behaviours and monitor and promote involvement in environmental programs. They actively support this by:
- Involvement in safety observations (includes environmental aspects), auditing and HSEQ Workplace inspections.
- Promote and encourage activities and personnel that improve HSEQ performance.
- Development and monitoring of Site Specific risk/impact Register.
- Commence meetings with a safety or environmental moment.
- Attend Pre-start Toolbox meetings.
- Develop plans to improve HSEQ performance of individuals and teams.
- Follow up outstanding corrective actions.
- Set and discuss HSEQ objectives and targets with line management and employees.
- Commit adequate resources to HSEQ maintenance and improvements.
- Participate in incident investigations and impact assessments.

Employees participate in the following team activities to improve environmental performance:
- Safety/Environmental Campaigns.
- Recognition Programs.
- LiveSafe conversations/interventions.
- TBRA Reviews.
- HSES Committee Meetings (attended by all employees).
- Pre-start Toolbox Meetings, includes HSEQ items.

Where HSEQ performance warrants recognition, positive re-enforcement will be considered utilising the ASCO Recognition and Reward procedure. Where HSEQ performance falls below the expected standard, an agreed corrective actions plan will be developed and a mentoring programme will be initiated ensuring appropriate supervision and support until resolve and performance is demonstrated to at least the minimum level expected. Any person or persons responsible for the violation shall, if required, shall be retrained, disciplined or removed from the work site as appropriate. This process will be managed in accordance with 'Rules of Fair Play Culture' and the ASCO PL-AUS-HR-004 Human Resources and Industrial Relations Management Plan.

6.3 Roles and Responsibilities

All roles for ASCO employees shall be clearly defined in individual Job Descriptions; which will include detailing HSEQ responsibilities. Job Descriptions will be communicated to each employee as part of their initial Employee Induction. A signed copy of the Job Description will be kept on file by ASCO and the individual will be given a copy in a language that they can read and understand.

Each Job Description will be made readily available to Client upon request. Where it is a specific contract requirement, proposed Key Personnel will require vetting and approval by the client prior to commencement of operations.

Expected HSE individual performance targets and objectives will be agreed and documented for all ASCO employees utilising the Personnel Safety Contracts.

Individual performance will be appraised and measured against set targets and objectives during appraisal process, with feedback being given in writing to the individual.

6.3.1 Key Organisation Chart Personnel

CEO
- Providing the resources required to set and sustain the highest standards of HSEQ.
- Making adequate funds and human resources available for HSEQ.
- Ensuring that all levels of management are responsible and accountable for HSEQ and that they apportion an appropriate percentage of their time on HSEQ matters.
- Ensuring that adequate numbers of HSEQ professionals are in place.
- Approve this EMP.

Director of Operations and Safety
- Management of the Business, in accordance with Contractual Obligations, defined objectives and AIMS.
- Ensuring compliance to AIMS requirements is maintained.
- Preparation and control of Business programs and processes.
- ASCO interfaces.
- Periodic contract review.
- Ensuring that all levels of management are responsible and accountable for HSEQ and that they apportion an appropriate percentage of their time on HSEQ matters.
- Implement Impact Assessment Procedure and Approval.
- Implement Impact Assessment Procedure and Approval for all direct responsibility BU's.
- Chairing Management Review Meetings.
- Management of the HSEQ function in accordance with Contractual obligations, defined HSEQ objectives and the AIMS.
- Compliance with statutory obligations under State or Federal legislation relating to the HSEQ.
- Implementation, control and maintenance of the AIMS.
- Advising the RMT and BM to ensure compliance to the AIMS is maintained.

Regional HSEQ
- Monitoring and review of AIMS requirements and ensuring required changes relating to HSEQ are incorporated in the AIMS.
- Ensuring audits at suppliers and/or subcontractors facilities are completed as required.
- Ensuring HSEQ internal system and compliance audits and inspections and third party audits are completed in accordance with the Audit Schedule and timely corrective actions implemented, where required.
- Training and coaching in the requirements of the AIMS.

Operations Manager
- Identification and implementation of Client specific procedures and work instructions.
- Review and revision of the Scope of Services and all relevant contractual documentation as received and liaison with Line Management.
- The management of ASCO resources.
- Sub-contractor management and supervision.
- Ensuring that the Work is performed in accordance with the requirements of Management Plans, applicable regulatory and legal requirements and contractual obligations.
- Ensuring that audit non-conformances are actioned in a timely manner and appropriate preventive actions implemented to prevent recurrence.
- Maintenance of the site files.
- Attending Toolbox Meetings.
- Attending HSES Committee Meetings.
- Championing LiveSafe (Behavioural Based Safety) program.

HSES Advisor
- Advising the HSEQS Manager to ensure compliance to the AIMS is maintained.
- Submitting required documentation to customers.

- Completion of audits at suppliers and/or subcontractors facilities.
- Conducting HSEQ workplace inspections.
- Supporting the investigating of incidents, assisting in the determination of root cause and timely corrective action.
- Analysing incidents for trends, ensuring preventive action is implemented where required.
- Coordination and completion of inductions and HSEQ awareness training.
- Monitoring that impact assessments/TBRA's are completed for all tasks and activities, taking into consideration environmental aspects.
- Ensuring all required training and inductions are completed in accordance with Contractual obligations.
- Maintaining the Hazardous Substance Register.
- Maintain Risk/Impact Registers.

Supervisors

- Supervision of Supply Base operations ensuring that they are carried out in accordance with the requirements of the AIMS, HSEQ Management Plans, applicable regulatory and legal requirements and contractual obligations.
- Ensuring employees and subcontractors assigned to a task are appropriately trained and qualified.
- Ensuring plant and equipment is maintained in accordance with the manufacturer's instructions, and/or AIMS requirements.
- Ensuring compliance to operational procedures and work instructions.
- Ensuring that a TBRA exists for every task and those undertaking the task have been trained in the requirements.
- Correlation of all MSDS(s) and related documentation and ensuring that those handling chemicals are trained in the requirements of the MSDS.
- Correctly storing material, to prevent damage or contamination and ensuring compliance to regulatory requirements.

All Workers

- Complying with HSEQ Management Plans, policies, procedures, instructions and duties.
- Taking reasonable care to ensure own health and safety at work and avoid adversely affecting the health and safety of others or the environment.
- Contributing to the accomplishment of HSE objectives and targets.
- Participating actively in HSEQ programs and assisting to improve operations wherever possible.
- Correct use of appropriate personal protective equipment (PPE).
- Rectifying immediately (if possible) and reporting to Supervision any actual or potential environmental incident, aspect or occurrence.
- Identifying and reporting nonconforming or potentially hazardous systems, work practices, products, services, equipment and places.
- Assisting fully in the investigation of any incident, harm or property damage.
- Attending and participating in HSEQ meetings.
- Ensuring that all tools, equipment and facilities are in good working order and condition prior to selection and use.

7.0 Policies and Procedures

ASCO acknowledges its commitment to HSEQ and affirms this via its Group HSEQ Policy. ASCO procedures reflect both global and local HSEQ requirements.

7.1 AIMS

AIMS incorporates all business functions, including Health and Safety, Quality Assurance and Environmental Protection and is internationally accredited to ISO and OHSAS standards.

AIMS uses risk-based quality management techniques to ensure compliance without the need for specific go/no go decision trees. The quality surveillance of AIMS is done through a series of meetings, KPI's, internal and external audits, and agreed corrective actions monitored through the GOP-HSEQ-046 Service Improvement Document (SID) process.

AIMS comprises 16 elements which make up the AIMS Business Management Manual. This AIMS Business Management Manual is the top level document for all ASCO Group companies and locations. It projects a set of minimum standards, which provides ASCO personnel with guidance in meeting the principles of good Health, Safety, Environment and Quality management.

Implementing AIMS requirements is mandatory for all ASCO BUs and Controlled Sites.

7.2 HSEQ Policy

ASCO has an established HSEQ Policy communicating management commitment to the protection of employees, others involved in its operations, the public, and the balanced environmental and economic needs of the communities in which the ASCO operates. The Policy sets out the aims of ASCO in key areas of HSEQ Management and highlights the ASCO's commitment to continual efforts to identify and manage safety and health risks and to improve environmental performance.

ASCO will ensure that the HSEQ Policy Statement is available at all times on-site, is communicated to all new personnel and sub-contractors and is displayed on notice boards within the facilities.

7.3 Policy Review

All Policy Statements and Procedures are regularly reviewed to ensure they are current, comply with all Legal and Client requirements and are appropriate to the all operations being conducted by ASCO.

7.4 Procedures

ASCO has a documented list of HSEQ Procedures which are applied for the conduct of the Scope of Services. The procedures are available on the ASCO Intranet and are reviewed and revision control managed via the Director of Operations and Safety.

8.0 Objectives and Targets

Safety Management objectives and targets shall be implemented at Regional and BUs level.

The following AIMS procedure is to be utilised:
- GOP-HSEQ-034 LiveSafe HSEQ Scorecard and Reporting Guidelines

ASCO utilises an HSEQ Scorecard to:
- Establish the reporting requirements applicable to HSEQ in relation to all activities occurring at each ASCO operated sites.
- Provide a governing document to ensure consistent recording of information and scorecard data.
- Define leading and lagging indicators within the HSEQ Scorecard. Identify and allow analysis of trends.
- To allow location comparison.
- To accurately record information in order to develop ASCO continual improvement strategies and if necessary undertake tactical interventions.

The metrics from the Scorecard will be forwarded to the Regional HSEQ Manager on a monthly basis for inclusion in the LiveSafe Database to track Regional and Business Unit performance.

9.0 Aspect Identification and Impact Assessment and Control

Prior to the commencement of any work ASCO shall conduct the necessary Environmental aspect identification and impact assessment(s) for the work involved.

The aspect identification and impact assessment process must identify and evaluate the aspect and impact associated with the expected scope of work and must include an agreement of the necessary control measures to eliminate or reduce the identified impact to an ALARP level. The impact assessment process must involve suitable personnel of sufficient experience to ensure the integrity in the impact assessment process.

Where ASCO undertakes a simultaneous operation / task with third parties, ASCO shall undertake an impact assessment in consultation with third party operator.

All actions arising from the impact assessment shall be implemented within the time periods agreed by the impact assessment attendees.

Changes to Site configuration, procedure or process as an outcome from aspect identification will be controlled by ASCO utilising ASCO Management of Change process to ensure that aspects are correctly identified and assessed, and any consequent change is appropriately engineered, executed and documented.

Findings from assessments shall be documented and actions recorded in the ASCO HSEQ database and tracked to completion. Results of aspect identification shall be incorporated into site improvement plans and shared with stakeholders. ASCO shall review and approve changes to the list of planned assessments.

ASCO shall ensure that impact assessment documentation meets state and territory legal requirements for each impact assessment carried out.

The following AIMS procedures are to be utilised:

- GOP-HSEQ-019 Hazard Identification and Control

The approval authority for impact assessments and Task Based Risk Assessments (TBRA) is subject to the Hazard Severity (the level of residual risk level) in accordance with GOP-HSEQ-11 (Task Based Risk Assessment Matrix). The approval levels are:

Serial	Aspect Severity	Remarks	Approval Level
1	1-6	May be acceptable; however, review task to	Operations Manager
2	7-14	Task should only proceed with appropriate management authorisation after consultation with specialist personnel and assessment team. Where possible, the task should be redefined to take account of the aspects involved or the impact should be reduced further prior to task commencement.	Business Manager
3	15-25	Task must not proceed, it should be redefined or further control measures put in place to reduce impact. The controls should be re-assessed for adequacy prior to task commencement.	

9.1 Sub-Contractor Aspect Identification and Impact Assessment

Prior to the commencement of any work's subcontractors shall demonstrate to the satisfaction of ASCO that the sub-contractor has conducted the necessary safety aspect identification and impact assessment(s) of the work involved, to meet the requirements of ASCO standards.

Sub-contractor aspect identification and impact assessment process must identify and evaluate the aspects and impacts associated with the contracted SoW and must include an agreement of the necessary control measures to eliminate or reduce the identified impacts to an ALARP level. The impact assessment process must involve suitable personnel of sufficient experience to ensure the integrity in the impact assessment process.

All actions arising from the impact assessment shall be implemented within the time periods agreed by the impact assessment attendees. The sub-contractor may use their own risk assessment matrix to assess the aspects identified provided the assessment process is on par or exceeds ASCO Standards and has been accepted by ASCO. Sub-contractors shall invite an ASCO representative to attend HAZID and impact assessment workshops.

9.2 HAZID and Risk/Impact Register

ASCO has conducted a HAZID Workshops that assess aspects associated with the contracted SoW. A copy of the HAZID output. From this HAZID an ASCO/Client SoW Risk/Impact Register has been developed.

The ASCO/Client SoW Risk/Impact Register will be periodically reviewed via the ASCO Management Review process to incorporate any additional aspects and controls that have been identified via the operational conduct of the contracted SoW.

When conducting an environmental assessment, consideration is given to the potential impact on the environment to such things as the following:

- Descriptions and quantities of dangerous goods used, stored and transported on site.
- Descriptions and quantities of hazardous wastes, produced, stored or transported on site and the method required for disposal.
- Details of potential for groundwater contamination, location of stormwater drains, maintenance requirements, potential of run off into the drainage system and the contaminants introduced.
- Details of potential atmospheric contamination including generation of dust and the release of greenhouse gases.
- Potential for contamination of the ocean during unloading and loading activities.
- Details on the impact of the sites operations on local flora and fauna.
- Levels of noise generated onsite and within the community.
- Traffic movements on and off the site.
- Consumption of natural resources.
- Consumption of energy.
- Generation and disposal of waste.

Any activities where the associated impacts are assessed as high or significant after controls have been implemented require Operations Managers approval before proceeding.

In deciding the control method to be applied, the following aspects are to be considered:
- Effectiveness of the control:
  - Will the aspect be eliminated or sufficiently reduced by applying the control?
- Practicality of the control:
  - Will the control introduce other aspects?
  - Can the control be enforced?
  - Is the control affordable?

Once controls for each aspect have been determined, the associated impacts are to be re-assessed to verify that the impacts have actually been reduced to acceptable levels.

10.0 Operations Management and Control of Work

When ASCO conducts it Services, there is the potential for risk and harm to people and the environment and for damage to equipment.

Therefore, an effective Operations Management process provides a work environment that allows tasks to be completed safely and without unplanned events to cause injury, environmental damage or damage to plant or equipment.

ASCO manages operations in accordance with the ASCO Operations Management Plan (OMP). ASCO's OMP sets out a required approach for its employees and their Sub-contractors to manage work impact. The safety elements in the OMP are:

- Documented processes.
- Control of work.
- Planning and scheduling.
- Task-based risk assessment.
- Permit to work.
- Authorisation and communication.
- Monitoring and interruption of work.
- Work completion and close out.
- Auditing.
- Lessons learned.
- Stop unsafe work.
- Operational Functions
  - Energy isolation.
  - Ground disturbance.
  - Confined space entry.
  - Working at heights.
  - Hot work.
  - Lifting operations.
  - Transport.

10.1 Documentation Processes – Safe Work Procedure

Where work is conducted at ASCO locations, safe work procedures shall be implemented. Where the safe execution of the work requires co-ordination ASCO can in consultation with third parties and or Client develop a coordinated plan. Safe work procedures shall include but are not limited to:

Serial	Function	Procedure No.
1	Working at Heights	GOP-HSEQ-052
2	Permit to Work	GOP-HSEQ-041
3	Planning a Lifting Operation	GOP-HSEQ-042
4	Chemical Management System	GOP-HSEQ-009
5	Control of Noise at Work	GOP-HSEQ-005
6	Control of Vibration	GOP-HSEQ-008
7	Adverse Weather	PL-AUS-DAR-008
9	Task Based Risk Assessment	GOP-HSEQ-047
10	Emergency Response Planning	GOP-HSEQ-012
11	Manual Handling Risk Assessment	GOP-HSEQ-038
12	Personnel Safety Equipment standard	GOP-HSEQ-024

10.2 Control of Work

10.2.1 Levels of Authority

Levels of authority for approval to proceed with work shall be based on the level of risk. The definition/description for each authority level is detailed in Risk Matrix.

10.3 Single Point of Accountability

There shall be a Single Point of Accountability (SPA) for Operations Management. The ASCO SPA is the Operations Manager.

10.4 Planning and Scheduling

The planning and scheduling of work is to allow time for the following actions for the safe execution of the work:
- Aspect identification task impact assessment(s) and TBRAs required for the completion of the task(s).
- Allocation of employees and equipment required for the safe completion of the work.
- Development of risk assessed and approved plans for the following:
  - Work.
  - Safe isolation and re-instatement of the plant or equipment.
- Simultaneous operations are:
  - Identified, considered for their compatibility and impact assessed.

10.5 Task Based Risk Assessment (TBRA)

Task Based Risk Assessments GOP-HSEQ-047 are an ASCO requirement to ensure that risks/impacts have been assessed arising from any of its activities to ensure necessary control measures have been adopted.

Each worksite is to be inspected as a part of conducting the task risk assessment prior to work being performed.

Task Based Risk Assessments are conducted to identify potential hazards/aspects associated with the work, including those identified for tasks that are related to Management of Change.

At least one member or representative of the team or teams performing the task participates in the task risk/impact assessment.

Task risk assessment team defines and records risk/impact control and mitigation actions as part of the task risk/impact assessment process.

To reduce risk, task risk assessments consider the hierarchy of controls in the following order:
- Elimination.
- Substitution.
- Engineering Controls.
- Isolation.
- Administrative Controls.
- Personal Protection Equipment (PPE).

To use the hierarchy of controls protocol, the following steps are taken:
- Attempt to eliminate the aspect from the task.
- If an aspect cannot be eliminated, continue to substitution.
- If the aspect cannot be eliminated or substituted, continue to engineering controls.
- If the aspect cannot be mitigated with engineering controls, continue to isolation methods.
- If isolation methods are not feasible, use administrative controls.
- Consider PPE only as the last protective barrier before an employee is exposed to an aspect.
- Rely on PPE only after all other efforts have been made above.

When identifying aspects, the following environmental factors are considered:

- Dust, vapour, irrespirable atmospheres.
- Chemicals, hazardous substances and dangerous goods.
- Noise.
- Heat/cold.
- Wet/dry.
- Lighting:
    - Too bright – glare.
    - Too dark.
- Inhalation, ingestion, absorption.
- Radiation.
- Bacteria.
- Gas/emission release.
- Spills:
    - Containment.
    - Emergency Response Procedures.
- Vibration.
- Ambient noise (communications).

10.6 Environment Protection Procedures Relevant to the Work

ASCO has developed a systematic process for the identification and development of control methods that minimise environmental impacts.

10.6.1 Lighting Management

To reduce energy use where possible, ASCO has established the following lighting management criteria:

- Lights off policy, for all areas not in use and end of day routine.
- Energy efficient fluorescent globes are to be used in all lights.
- FRM-WA-GOP-TRAN-004.13.05 Lighting Tower Checklist

10.6.2 Flora and Vegetation

Due to the nature and diversity of ASCO operations, ASCO personnel may be exposed to instances of contact with native vegetation and flora habitats. ASCO management will ensure that management controls are consistent with ASCO requirements where applicable and the provisions of applicable Acts.

10.6.3 Solid and Liquid Waste

ASCO has developed comprehensive procedures for the control and minimisation of waste:

- Dry Waste - items covered include, but are not limited to:
    - Scrap metal and disused components.
    - Scrap cardboard, timber and other packing materials.
    - Kitchen scrap.
- General yard, office and warehouse waste not collected by mechanical sweepers.
- Empty 205ltr drums.
- Tyres, collected and reused as packaging.
- Waste Water - wastewater from runoff due to quarantine activities is captured by wastewater separators at designated wash points, treated and reused.
- Oils and Contaminants - waste oils generated locally or those received from client are treated as Controlled Waste.
- Sanitation Facilities - subcontractor services these facilities on a regular basis.

- Batteries – recycled.

Waste management/minimisation programmes have been established at all locations, where available for cardboard, paper, plastics, aluminium cans and printer cartridges. The recycling of all types of waste is encouraged.
Waste which cannot be recycled is collected and disposed of by approved sub-contractors.

10.6.4 Hazardous Materials

Hazardous substance and dangerous goods management on all ASCO controlled sites.

Procedures and systems are established for the:
- Introduction of Hazardous substances to site.
- Handling and or use of Hazardous substances and dangerous goods on site.
- Transport of dangerous goods.
- Storage of Hazardous substances and dangerous goods (long term and in transit).
- Disposal of Hazardous substances and dangerous goods.

The Australian Dangerous Goods Code (ADGC), IATA regulations (for air freight), applicable Codes of Practice and State / Territory regulations are referenced to ensure compliance to all aspects of dangerous goods storage and transport.

Radioactive substances (Class 7) are managed in accordance with the Code of Practice for the Safe Transport of Radioactive Material, regulated by the Australian Radiation Protection and Nuclear Safety Agency and NP 087 Transport of Radioactive Materials.

Explosives (Class 1) and Security Sensitive Substances are managed in accordance with the Australian Explosives Code (DOTARS), Security Code of Practice (FIFA), applicable provisions in State / Territory legislation and NP 090 Explosives and Security Sensitive Substances.

MSDS for all chemicals stored at ANY FACILITY are readily accessible and all personnel made aware of their location.
A Hazardous Substance Register is kept for all hazardous substances used in the workplace which includes as a minimum the name of the substance, corresponding MSDS and whether an impact assessment has been completed.

Where using hazardous substances the requirements of the MSDS must be followed. It is mandatory that all employees:
- Read the MSDS before using the substance.
- Use the personal protective equipment as described in the MSDS.
- Immediately clean up and then report any spills.
- Ensure that other personnel are not exposed.
- Ensure that others working around them comply with these requirements.

10.6.5 Noise and Vibration

ASCO manage the impact of exposure to noise and vibration aspects in accordance with legislative requirements and Australian Standards.

Noise surveys will be conducted and noise shall be monitored periodically and controls applied in accordance with impact management processes.

ASCO management shall ensure that plant and equipment complies with relevant Noise Regulations. Equipment will be appropriately fitted, maintained or substituted with noise reduction devices if necessary to comply with Project noise levels, where specified.

Activities shall be managed according to proximity to noise sensitive areas to minimise impact of noise and vibration emissions.

10.6.6 Stormwater and Drainage

The Operations Manager shall ensure that management systems are implemented where operations may have an adverse effect on surface and groundwater.

All surface run-offs from work activities will be contained as specified by the ASCO to prevent pollution and erosion.

Wash down of vehicles and equipment shall only be allowed in ASCO designated areas and where undergoing quarantine.

10.6.7 Fauna Interaction

Due to the nature and diversity of ASCO operations, ASCO personnel may be exposed to instances of contact with native fauna. ASCO management shall ensure that management controls are consistent with ASCO requirements and the provisions of applicable Acts e.g. Wildlife and Conservation Act 1950; Environmental Protection Biodiversity Conservation Act 1999.

In the event that an animal is hit with a vehicle, it is the responsibility of the driver to check on the injured animal. Assistance to the animal shall be provided as necessary. It is against the law to kill native animals.

10.6.8 Atmospheric Emissions (including dust)

ASCO management shall ensure that the production of air borne contaminants is eliminated at the source, or at the very least mitigated by robust controls. A monitoring program shall be established and it will be reviewed periodically for effectiveness.

All plant and equipment that generate emissions shall be monitored for excessive exhaust and plant shall be serviced in accordance with the manufacturer's requirements or sooner where required to ensure emissions are minimised.

Dust emissions from unsealed roads, stockpiles and work areas shall be suppressed, where possible. Vehicle speeds will be immediately reduced if dust emissions are visually excessive.

Burning of rubber and plastic products, waste oil or any other waste is not permitted.

ASCO shall work progressively towards minimising greenhouse gas emissions where practicable for all aspects of site operations and actively promote energy efficiency initiatives and controls.

10.7 Permit to Work

A permit is a formal authorisation to carry out a specified work scope and define responsibilities and Hazard control measures

Title: **Environmental Management Plan**

This permit is used where the risk potential is increased. (e.g. hot works, third party contractor, electrical works, working at height, electrical isolation, entry permit, or abnormal lifts, dual forklift operation, dual crane operation).

Permit Control is to be managed by the Operations Manager/ delegate.

10.8 Procedure

The following AIMS procedure is to be utilised:
- Permit to Work GOP-HSEQ-041

For the safe execution of work, involved employees shall be acquainted with the following:
- Identified potential aspects.
- Likelihood of those potential aspects being realised.
- Controls and mitigation actions that have been applied to reduce the possibility of an incident or accident.

All employees will be trained and competent to identify, assess and execute the following:
- Work scope.
- Aspects.
- Controls.
- Mitigation measures.

Regular Worksite inspections are to be conducted by team leadership to:
- Confirm that the control(s) and mitigation(s) measures are recorded in the permit documentation or the procedure that needs to be in place before start of work is in place.
- Confirm that conditions have not materially changed so as to necessitate different or additional control measures.
- Identify potential safety considerations that may not have been previously noted.
- Identify material changes to the site that affect the findings of the original task impact assessment.

Review of the existing assessment or development of a new impact assessment is required if there are:
- Material changes to the site.
- Aspects that were overlooked by the task risk/impact assessment.

Scope, aspects, controls and mitigation measures for permitted work are:
- Communicated in writing.
- Understood by employees who are involved in the task(s).
- Signed off by employees who are involved in the task(s).

An employee who is responsible for issuing the permit confirms that the employees accepting the permit fully understand its contents.

An employee who is responsible for issuing the permit verifies that the permit acceptor:
- Understands the scope of the work permit.
- Understands the requirements of the work permit.
- Understands adjacent tasks/aspects.
- Understands initial emergency actions.
- Understands the equipment and/or process entered on the permit.
- Clearly identifies the equipment and/or process entered on the permit.
- Is able to identify whether changes in the work environment invalidate the original permit.
- Ceases the work until a reassessment has been completed if changes invalidate the permit.

Employee accepting the permit:

- Verifies that employees involved in the task have:
  - o Signed the permit.
  - o Understood the contents of the permit, especially the:
    - ▪ Location.
    - ▪ Scope of work.
    - ▪ Aspects that may be encountered.
    - ▪ Controls in place to reduce the aspects and their effects.
    - ▪ Mitigating measures in place to reduce the effect of an unplanned event.

- Communicates to confirm full understanding of the information being conveyed:
  - o At the start of the task.
  - o At the agreed upon steps of the task.

A copy of the permit is retained on site for the duration of the work for the benefit of the following:
- General workforce.
- Site inspections.
- Audits.

Workforce in the affected area is informed of and understands the impact and status of work, which may affect the workforce prior to commencement of that work.

10.9 Stop unsafe Work

All Personnel will be briefed that they:
- Have the obligation and authority to STOP unsafe work.
- Are to report unsafe work to his or her supervisor.

The SPA is required to:
- Record instances of work being stopped for reasons of safety.
- Investigate reports of unsafe work from any member of the workforce.
- Record the results of any investigation of reports of unsafe work.

11.0 Audit, Performance Review and Improvement

11.1 Environmental Audit and Inspection Program for the Work

System audits shall be carried out by the Site Management Team the EMP and AIMS requirements to ensure conformity in accordance with Internal Auditing procedures.

Audits of subcontractors and relevant suppliers shall be carried out at regular intervals as determined by ASCO. Audits of service provider/drivers shall be completed annually in accordance with CARE Procedure.

Environmental self-assessments as part of ASCO LiveSafe Inspections will be completed on a monthly basis by the HSEQ Advisor.

A third party audit against the Environmental Management Plan shall be scheduled for completion within 12 months of contract award. The audit requirement shall be included as part of the requirements to ISO Accreditation.

ASCO agree that Client shall be given the opportunity to participate in audits at any premises where work is being performed, providing that ASCO is given prior notification of the planned audit and the scope of the audit.

Non-conformances from audits, pre-start workplace inspections and environmental self-assessments shall be actioned in accordance with ASCO Service Improvement Document Procedure.

11.2 Pre Start Workplace Inspection

ASCO line management including HSE personnel and representatives shall conduct daily Pre-Start Inspections of the work place. The inspection format will be in accordance with the LiveSafe Intervention Procedure and shall include checks required to prevent pollution and environmental damage relevant to the Scope of Work and identified aspects.

Where necessary ASCO shall expand or implement additional HSEQ inspections to verify that the work place and work practices are safe and in accordance with legislative and Site and HSEQ obligations.

The inspection results shall be tabled at the HSEQ Meeting and HSEQ Committee Meeting and a copy placed on the HSE notice board.

ASCO understands its duty and obligations to ensure suitable and sufficient audits are continually conducted in order to fulfil the requirements of all relevant occupational health and safety regulations to ensure employee/third party wellbeing, ASCO currently hold 9001, 14001 and 18001 ISO accreditations for its current Darwin based Australia operations.

ASCO shall conduct internal audits/assessments covering all work locations, and including annual reviews for effectiveness. All audits shall include but not limited to ASCO management team and HSEQ department as well as Subcontractors where applicable.

11.3 Audit Schedule and Reports

All Audits follow ASCO FRM-GOP-HSEQ-042.02 Audit Schedule and ASCO Annual Group Schedule.

ASCO shall promptly respond to Client audit findings (typically within ten working days) indicating what action is planned or being contemplated to address the findings and recommendations. The status of closing audit findings and recommendations shall be included in the monthly report.

All audit findings and areas for improvement relating to the contracted SoW will be tracked utilising the GOP-HSEQ-046 Service Improvement Process (SID) all service improvements to track all improvements until resolved, all related SID's will be made available to Client.

Records of all audit findings and Audit Reports relating to the contracted SoW will be retained for a period of no less than 7 years and will be made available to Client and relevant parties upon request.

11.4 Service Improvement Document (SID)

The GOP-HSEQ-046 Service Improvement Process (SID) system is the foundation of the ASCO process for addressing non-conforming product or service. Any issue that is raised internally or externally that has the potential to impact ASCO or Client activates, resulted in a service failure or complaint will be addressed through this system.

Through the SID system, issues are document and recorded formally and assigned to the relevant personnel for investigation. Subsequently corrective and preventative actions are implemented to eliminate reoccurrence.

All SID raised are recorded on the LiveSafe Database, all SIDS will are categorized and are utilised for trend analyses all analyses will be shared with ASCO locations worldwide to communicate Lessons Learned.

The SID system is also the primary tool for promoting proactive suggestions for continual improvement and for formally recording any commendation for exceptional service provisions

All Client or third party requests, concerns or recommendations will be raised in the SID format, in order to fully investigate, resolve and record; Client and third parties can request copies of current or previous SID's at any time.

11.5 Management Review

Management review meetings will be held as a minimum annually. In the case of the contracted SoW, reviews will be conducted every quarter for the first 12 months of the contracts. The Management Review Meetings are to be chaired by the Director of Operations. As a minimum, Management Review Meeting agendas must include the key elements for review;

- HSEQ plans and procedures.
- Targets and objects.
- System improvement plans.
- Incident stats and trend analysis.
- Effectiveness of internal and external audits.
- Review of the EMP.
- All management review minutes and action points raised will be available to Client or relevant third parties on request.

11.6 Sub-Contractor Environmental Audit

ASCO shall have the right but not the obligation to conduct audits/inspections of its sub-contractor operations, equipment and emergency procedures at any time without giving prior notice.

Sub-contractors shall fully co-operate with ASCO during such audits/inspections.

ASCO shall not relieve its sub-contractors of its obligations to conduct audits and reviews of its safety performance nor expose ASCO to any liabilities which may arise from a sub-contractor's failure to satisfy its safety obligations. Where such audits reveal deficiencies in a sub-contractor's procedures, drills, training, practices or equipment when compared to the requirements of the service requirements, the sub-contractor shall rectify such deficiencies within a time frame agreed between both parties.

11.6.1 Review and Audit Procedure

The following AIMS procedure should be utilised:
- GOP-HSEQ-30 Contractor Assessment and Risk Evaluation (CARE)
- GOP-HSEQ-017 External Audits
- GOP-HSEQ-032 Internal Audits
- GOP-HSEQ-027 HSEQ Management Review

12.0 Management of Change

ASCO utilises the Management of Change (MoC) procedure for significant task changes and plant and equipment changes. The procedure includes guidance on identification of changes that needs to be managed following an initial or formal review. This is followed by an approval stage, commissioning and implementation and a 3-month follow up.
If a request for change or deviation to the contracted SoW is initiated by Client, the MoC process will be utilised.

ASCO acknowledges that only authorised, competent personnel can approve changes, either permanently or for a defined period and only after impacts have been demonstrated to be ALARP using approved risk/impact management techniques.
All management of change activities will be fully controlled utilising the ASCO risk management and hazard analysis process.

All change managing outcomes will be fully communicated utilising safety communication process.

This SMP adheres to ASCO procedure GOP-HSEQ-036 Management of Change

13.0 Training and Competency

ASCO and sub-contractors are responsible to provide competent personnel to perform their duties safely and effectively, implementing systems for personnel selection and competency assessment. ASCO manages training and competency in accordance with the ASCO Competence Assurance Management System GOP-TDC-001 and Training Management Plan PL-AUS-HSEQ-03.
 This details procedures and requirements to ensure that employees and Subcontractors are:
* Trained and competent in the tasks they are performing.
* Able to meet the competency requirements for their assigned roles.

The Competence Assurance Management System addresses the following:
* Definition of the competencies for each identified role. Competencies for each identified role are documented and used to establish detailed training and competence testing for each role/employee.
* A documented program of review for defined competencies in place to capture lessons learned.
* Training phases, including:
    o Induction training.
    o Initial training.
    o Refresher training.
    o Recertification.
    o Remedial training for employees who are recognised as operating below established standards.

* The implementation and maintenance of a documented training program (e.g., training matrix).
* Verification of Competency to assess the levels of competence of employees.
    o Management of training and competency records, noting that they are to be maintained and updated.

13.1 Environmental Induction Training

Personnel will be given a site specific induction explaining the nature of the work, the general aspects which may be encountered, the particular aspects attached to their function and the legislative and regulatory requirements applicable to set task or tasks.

Environmental information is included as follows:
* ASCO Induction.
    o New start employees – 13-week induction programme and inclusion onto ASCO Training Matrix.
    o Sub-contractors.
* Contract / Project Induction. All personnel / Subcontractors assigned to the specific Contract / Project.
* Site Induction.
    o Personnel temporarily visiting ASCO Controlled Sites will undertake a Site Specific Induction.
    o Ad-Hoc workers – inclusion onto the ASCO training matrix, (operational personnel).
3rd Party/Visitor Induction. All 3rd parties and visitors will be required to be inducted using a visitor induction prior to entering either the Administration or Operational Areas
* Environmental Awareness Training.

13.1.1 Sub-Contractor Inductions

All sub-contractor personnel undertake the ASCO Sub-Contractor Induction which provides HSEQ information and specific site rules to ensure all sub-contractor activities are conducted safety and in accordance to ASCO HSEQ standards.

13.2 Training Matrix

The Training Requirements Matrix details role specific training to ensure suitable and sufficient guidance has been received and understood to ensure task can be conducted safely, as outlined in Training Management Plan PL-AUS-HSEQ-03

13.3 Competency

ASCO will ensure all personnel and sub-contractors maintain the appropriate certificates, licences, qualifications and competency levels for the jobs they undertake in the performance of their duties.

Sub-contractors will be continually monitored for competency and skilled training utilising the GOP-HSEQ-002Contractor Assessment and Risk Evaluation (CARE) Process.

ASCO Darwin will designate an appropriately trained assessor, as outlined in Training Management Plan PL-AUS-HSEQ-03 to ensure there is integrity and consistency for all competency assessments.

13.4 Training and Competency Procedure

The following AIMS Procedures are to be utilised:
- GOP-TDC-001 Competency Assurance Management System
- PL-AUS-HSEQ-03Training Management Plan

14.0 Workforce Involvement and Engagement

ASCO ensures all personnel are made fully aware of all known aspects and impacts associated with their work and are aware that they have a duty and obligation to stop the job. ASCO utilises its Communication Plan to detail the respective meetings, responsibilities, objectives and frequency for workforce involvement and engagement.

The matters addressed are:
- Kick Off Meetings.
- Safety Meetings.
- LiveSafe Conversations / Internventions.
- Daily Toolbox Talks.
- Daily and Weekly operational meeting.
- Monthly Leadership Group.
- Monthly Health and Safety Meeting.
- Quarterly safety and environmental themes.
- Health and Safety Representatives.
- Safety Notice Boards.
- Safety Communications.
- Town Halls

15.0 Information Management and Document Control

All documents utilised within the contract will be controlled utilising the ASCO Document Control process. Completed hard copy documents will be maintained in a secure and protected environment backed up electronically in line with best practice principals. Record retention details will be available upon on request.

16.0 Contractor Management (CARE)

ASCO adheres to the ASCO GOP-HSEQ-002 Contractor Assessment and Risk Evaluation (CARE) initiative, which we use to gauge the level of HSEQ management within its various contractors. The CARE initiative builds upon that through five key stages. In the first instance, all contractors are required to complete a thorough questionnaire that looks at how HSEQ is managed within their organisation. Based upon the impact imported into ASCO Australia, the contractor is then likely to receive a CARE Audit, conducted by ASCO HSEQ. The audit looks deeper into the management of health and safety within the ASCO, and will also focus upon quality management specific to the work they do for ASCO for key areas. The third key stage is the approval process. If the questionnaire and audit are satisfactory, the contractor will become CARE Approved, and where appropriate added to the ASCO CARE Audit schedule. If areas for improvement are identified during the first two stages, these will be fed back to the Sub contractor management, who will then be given the opportunity to address these areas, and if required, guidance on how to address them. This is one of the areas which we believe makes CARE and ASCO stand out from the crowd, in that we want to work with its contractors to achieve high standards in HSEQ management.

The following stage relates largely to those service provides that regularly conduct operational activity on an ASCO facility – the contractor induction. This will ensure that all contractor personnel have been introduced to the ASCO area site rules, policies and procedures, and are fully aware of the high standards required.

The final stage, once CARE Approval has been granted and work has commenced, are Review Meetings. These will take place between the contractor and key users of the service, with a view to address any service issues as promptly as possible.

16.1 Management of Contractors

ASCO manages all contractor interactions including contractor plant and materials utilising the GOP-HSEQ-37 Management of Contractors, ensuring all contractor or plant and equipment is suitable and sufficient for task and without modification.

17.0 Emergency Preparedness and Response

ASCO ensures suitable and sufficient systems for emergency response are implemented at all BUs/Controlled Sites. ASCO, third party contractors, and adjoining sites will be informed of relevant procedures, responsibilities and required actions as part of the site specific induction and include Emergency Response Team training.

BUs/Controlled Sites will conduct emergency evacuation drills twice yearly and these will be carried out to comply with the site Fire Risk Assessments and site specific Emergency Response Plans.

ASCO will periodically review all Emergency Response Plan's and implement training to ensure compliance to them. ASCO emergency provisions will be audited monthly as part of ASCO planned inspections. Within the planned inspection all first aid provisions, eye wash facilities, firefighting equipment, welfare facilities, Dangerous goods/ous Waste storage area and operational areas will be inspected. All non-conformance items will be recorded and an action plan implemented to manage rectification.

BUs/Controlled Sites will conduct spill response exercises on an annual basis. The results from these exercises will be recorded by ASCO to be available for review by management team, Client and external parties.

All emergency management non-conformances are to be recorded using the ASCO HSEQ Database. Incidents will be investigated and results will be circulated between all ASCO operations and Client for lateral learning.

All emergency plans have clear and precise instructions with clear defining roles and responsibilities.

All emergency plans are fully assessed utilising the ASCO risk management principles to ensure effectiveness.

17.1 Incident Management Philosophy

ASCO's overall response to an incident is based upon the following ASCO philosophy and priority:
- Safety of Personnel.
  - o Minimise the impact of the incident on personnel directly or indirectly involved.
  - o Protect the safety and health of all personnel involved in the response.
- Protecting the Environment.
  - o Minimise any impact of the incident within the environment's in which we operate.
  - o Protect environmentally sensitive areas in which we operate.
- Safeguarding Business and Assets.
  - o Minimise the impact of the incident on ASCO and/or project facilities and restore normal business as soon as possible. Utilising its Business recovery plan as to minimise impact on production and on-going operations.
- Protecting Reputation.
  - o Avoid or manage adverse publicity regarding incidents for the protection of ASCO and Client.
  - o Defend the reputation of ASCO, Client's partners and the wider industry.

17.2 Emergency Response Training

ASCO has developed an Emergency Response Plan (ERP) for all areas of responsibility based on the priorities detailed above. Part of the ASCO incident response planning has incorporated business recovery if a catastrophic event was to occur to ensure normal business function can be restored as quickly as possible.

Training is outlined in Training Management Plan PL-AUS-HSEQ-03 and the ERP-AUS-HSEQ xxx Site Specific ERP.

17.3 Organisational Incident Response

ASCO Australia's adheres to the ASCO incident response and investigation procedure, this document defines the process for communications, reporting, recording, investigations, senior management responsibilities and actions/trend analysis. Bridging documents will be devised to ensure all Client organisational incident response requirements are managed in accordance with Client protocols.

17.4 Incident Response Drills

To ensure continual staff/Client and third party awareness and readiness, as a minimum x 2 emergency response scenarios will be conducted within all ASCO locations yearly.

Emergency response scenarios will form part of area targets and objectives and will be incorporated into area HSEQ Scorecards.

All emergency response scenarios will be recorded utilising the Emergency incident/Drill form, all actions from emergency drill scenarios will be tracked utilising the GOP-HSEQ-046 Service Improvement Process (SID)

18.0 Hazardous Materials

ASCO recognises the importance of managing the impacts associated with Workplace Hazardous Substances, and has established procedures and framework in order to protect the environment against impacts arising from Hazardous Substances, used or encountered within ASCO work locations. ASCO procedures details ASCO Australia's approach in meeting its legal and moral obligations relating to Hazardous substances.

ASCO Control of Workplace Hazardous Substances procedure and associated documentation provided guidelines detail to ASCO personnel regarding the control of workplace Hazardous substances, requirements within ASCO controlled sites.

ASCO shall ensure that all Hazardous materials and waste materials are clearly marked, manifested, segregated, handled and stored in accordance with applicable Australian and International regulations and codes of practice. Safety Data Sheets (MSDS's) for all Hazardous materials supplied or used by the ASCO or Client will be readily available to all persons coming in contact with Hazardous materials, gazetted dangerous goods or chemicals. And will meet the requirements of the Australian National Code of Practice.

19.0 Incident Reporting Investigation

For work conducted at ASCO facilities, ASCO shall immediately report internally and to Client any incident if the incident has resulted in but is not limited to:
- Chemical spills reaching water or unlined/unprotected earth.
- Any HSE incident or high potential incident with potential for significant adverse reaction from government authorities, media or the general public.

The following incidents are to be reported by the next business day:
- Near misses.
- Accidental damage or loss of material or equipment.

All incidents with the potential to harm/including Near Miss are fully investigated by the Incident Control Team lead by HSEQ Advisor utilising ASCO procedures including but not limited to incident reporting and investigation and HSEQ incident report approval and distribution. All Client and Third parties will be invited to contribute where necessary to investigation process and all outcomes are shared for lateral learning in the form of lessons learned and safety alerts communications through the ASCO group utilising the LiveSafe communications process.

As part of the GOP-HSEQ-034 HSEQ Scorecard all investigations and any corrective actions from investigations are closed in line with allocated timelines (30 days). For ASCO controlled facilities the companies GOP-HSEQ-026 Hazard and Incident Reporting and Investigation procedure takes precedence and all aspects and incidents shall be reported using the ASCO LiveSafe Database.

Client representative are welcomed to participate in the investigation process.

Any incident requiring notification to 3rd parties, Government Departments or Regulators will be immediately reported to the Operations Manager. The Operations Manager will immediately notify the designated site based Client representative (verbally and in writing with copies of relevant incident reports as soon as practicable). The Operations Manager will provide verbal notification to these agencies within the required reporting timeframes.

20.0 Statistics and Analysis

HSEQ Statistics (KPI and PI) will be provided to Client as per the contracted SoW. The Operations Manager is responsible for ensuring that this data is provided in an accurate and timely manner.

20.1 Monitoring and Review

ASCO are committed to health, safety and the environment and are continually looking to better improve its health and safety practices, safety is paramount in the way we carry out each allocated task and through continual training, and safety awareness we can continually improve on its work practices.

This Safety Management Plan will be reviewed annually; the Plan may be reviewed sooner due to ASCO or Client request or concerns. ASCO Management and Client will be given the opportunity to input content during such

reviews. Any updated SMP's will be distributed in accordance with the ASCO Document Control procedure and all updated version of the plans will be located within ASCO AIMS.