



# Workplace Health and Safety Policy

**Atlas Arteria Limited**  
**Atlas Arteria International Limited**

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# Workplace Health and Safety Policy

## Introduction

For the purposes of this document **ALX** means Atlas Arteria Limited ACN 141 075 201 and Atlas Arteria International Limited Registration number 43828 and their controlled entities.

This policy applies to the employees, contractors, consultants and directors of ALX (together **ALX Staff**).

## Policy Statement

This policy sets out the requirements for identifying and managing workplace health and safety (**WHS**) risks which arise in the day to day activities of ALX.

ALX recognises its responsibility to provide a healthy and safe workplace and acknowledges that its operating businesses may also have exposure to WHS risks. This policy covers ALX 's approach to identifying and managing regulatory, reputation and investment risk arising as a result of its corporate and/or its businesses' WHS risks.

ALX seeks to maintain a safe and transparent culture that encourages proactive steps for safety at work, facilitates reporting and focuses on feedback, continuous improvement and learning.

Material incidents and breaches of this policy will be escalated to the ALX CEO and the relevant ALX Board. In the case of ALX Staff, a breach may result in disciplinary action, up to and including termination of employment, however any disciplinary action will generally be for behaviour involving reckless disregard for procedures.

## Corporate Activities

ALX is committed to ensuring, so far as is reasonably practicable, the health and safety of its directors, staff, customers and all visitors at its workplaces and to promoting the health and wellbeing of its staff.

To this end, ALX will:

- Ensure there are WHS management processes to identify workplace hazards and risks and eliminate risks so far as is reasonably practicable or, if this is not possible, to minimise the risks so far as is reasonably practicable.
- So far as is reasonably practicable, provide a safe work environment and safe systems of work.
- Undertake reasonable monitoring including safety reporting of the health of ALX Staff and conditions at its workplaces for the purpose of preventing illness or injury.
- Consult with employees on WHS issues that directly affect them, including via WHS representatives and/or the WHS responsible managers at a particular site.
- Providing ALX Staff with appropriate information, training, instruction and supervision and possibilities to raise issues as necessary for them to perform their role without risks to health and safety.
- Promote active rehabilitation and return to work programs with the aim of returning ALX Staff to pre-injury duties, or an alternative role as appropriate and to the extent reasonably practicable.
- Comply with relevant regulatory requirements relating to safety in the workplace and public safety.

## ALX Staff responsibilities

Each member of ALX Staff has an obligation to:

- Comply with this policy, procedures and safe work practices concerning WHS.
- Take reasonable care of the health and safety of themselves and others.
- Comply with any safe direction given by management or site WHS representative for health and safety.
- Not misuse or interfere with anything provided for WHS.
- Not consume or be under the influence of illegal drugs while at work.
- Not irresponsibly consume or use prescription drugs or alcohol.
- Attend WHS training and information sessions as requested.
- Report all accidents, incidents and near misses on the job immediately, no matter how trivial.
- Report all known or observed hazards to the site WHS representative.

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### Operating Businesses

ALX recognises that its operating businesses may have legal obligations and social and contractual responsibilities, including workplace health and safety. Such responsibilities arise as a result of activities, the employment of staff, use of contractors, interaction with the public, control of premises and the provision of services.

ALX strives for its operating businesses to regard WHS responsibilities as a high priority and to be committed to providing a safe place of work, free of occupational injuries and illnesses, and promote a “zero harm” culture.

ALX nominee directors will be expected to comply with their legal obligations and to support a governance framework which allows operating businesses to pursue:

- A culture that puts health and safety first.
- Compliance with all relevant WHS legal obligations.
- Provision of visible leadership, adequate resources and ensuring that workplace standards are maintained.
- A disciplined approach to the identification and management of WHS risks.
- Conducting business in a way that protects, or enhances, community safety.
- Measurement and continual improvement of WHS performance.
- Senior Management and Board oversight, including reporting.
- Effective, pro-active injury management processes to support employee rehabilitation.

Accordingly, the following apply to all ALX operating businesses:

- WHS due diligence will be performed on all potential business acquisitions.
- The results of WHS due diligence will be included in the investment proposal being presented to the ALX Boards for consideration.
- WHS performance of each operating business will be provided to the ALX Executive Team on a quarterly basis.

- A external safety audit shall be performed at regular intervals, in case the business is not certified according to ISO 45001.
- WHS performance of the ALX operating businesses will be communicated to the Boards through the CEO Reports and as part of the annual financial statement approval process.
- ALX Boards and nominee directors will receive training on their personal and entity’s WHS obligations and be encouraged to assess the safety performance of operating businesses during site visits.
- Where ALX has a minority stake in any business, any nominee directors appointed by ALX to that business should seek to influence the relevant entity to comply with this Policy.

### Responsibility

The ALX CEO will have ultimate responsibility for compliance by ALX staff with this policy.

The ALX General Counsel is responsible for monitoring compliance with this policy and promoting ALX staff understanding of its requirements.

Any breaches of this policy should be reported in the first instance to the ALX General Counsel who will escalate to the ALX Boards after consultation with the ALX CEO (who will determine the appropriate method and timing for escalation).

Major incidents will be reported to the ALX Boards within 24 hours of notification being received of such an occurrence.

### Review

No less than once every two years this policy will be reviewed and if appropriate updated and submitted to the ATLAX and ATLIX Boards for approval.

### Contacts

The ALX General Counsel should be contacted for any assistance or guidance in respect of the matters covered by this policy.