



Tower Limited

# Health & Safety Policy

May 2018

## Document Information

<b>Policy Name</b>	Tower Limited Health & Safety Policy
<b>Policy Type</b>	Board Policy
<b>Policy Preparer</b>	Governance Manager & Company Secretary
<b>Policy Owner</b>	Chief Risk Officer
<b>Policy applies to</b>	All staff members of Tower Limited and its subsidiaries
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<b>Approver</b>	Tower Limited Board
<b>Date of Approval</b>	28 May 2018
<b>Effective From</b>	28 May 2018
<b>Date of Next Review</b>	May 2020

## Document History

<b>Version</b>	<b>Date</b>	<b>Changes</b>	<b>Reason for change</b>	<b>Author</b>	<b>Date Approved</b>
1.0	May 2018	First version as recommended by the Governance Manager & Company Secretary.	Implementation of policy in accordance with best practice	Lara Teesdale	28 May 2018

## 1. Introduction

- 1.1 Tower Limited and its subsidiaries (together referred to as '**Tower**') are committed to providing a healthy and safe working environment for workers and other relevant persons (for example, visitors, customers etc), who may be affected by Tower's activities.
- 1.2 This policy sets out Tower's commitments and obligations in relation to health and safety. As a Person Conducting a Business or Undertaking (**PCBU**), Tower is required to comply with the Health and Safety at Work Act 2015 (**Act**). This Policy should be read alongside the Act and other relevant legislation and guidance.

## 2 Principles

- 2.1 Tower is committed to providing a healthy and safe environment for all of its workers and eliminating risks to health and safety as far as is reasonably practicable.
- 2.2 Tower will continuously monitor and improve its approach to health and safety risk management.
- 2.3 Health and safety includes all aspects of physical safety, as well as mental and emotional health and safety.
- 2.4 Health and safety is everyone's responsibility at Tower. Tower will strive to create a culture of health and safety awareness.

## 3 Responsibilities

### *Directors*

- 3.1 Tower Directors are responsible for:
  - Monitoring and reviewing Tower's Health and Safety Risks
  - Determining and regularly reviewing Tower's Health and Safety framework and Policies
  - Monitoring compliance with the framework, policies and relevant legislation
  - Holding the Executive Leadership Team to account for implementing health and safety strategy and achieving targets
- 3.2 Tower Directors will exercise care, skill and due diligence to ensure that Tower complies with its duties and obligations under the Act. Due diligence includes taking reasonable steps to understand Tower's operational health and safety risks, and ensure they are appropriately managed.
- 3.3 Directors will endeavour to visit Tower sites at least once per year to view Tower's health and safety approach and ensure alignment with Tower's Health and Safety principles and objectives.

### ***Executive leadership team***

- 3.4 Tower's Executive Leadership Team is responsible for:
- Identifying health and safety risks and implementing appropriate risk management strategies and systems
  - Determining health and safety targets and tracking Tower's performance
  - Monitoring and reporting on health and safety risks, hazards, incidents and mitigants
  - Creating a culture of health and safety awareness and communicating with workers on health and safety matters
  - Identifying and allocating appropriate resources to health and safety management
  - Striving for continuous improvement of health and safety systems and processes
  - Monitoring the health and safety practices and standards of contractors and third party providers to ensure alignment with Tower's objectives
  - Supporting employees injured at work to participate in rehabilitation programmes to facilitate the early return to work.

### ***All Officers (being Directors and the Executive Leadership Team)***

- 3.5 All Officers:
- Should keep updated about best practice matters relating to health and safety
  - May obtain external health and safety advice where reasonable and appropriate
  - Should commission periodic external reviews of Tower's health and safety systems, processes and practices to ensure continued alignment with best practice.

### ***Health and Safety Advisor***

- 3.6 The Health and Safety Advisor is responsible for advising the Board and Management on all health and safety matters. In addition, the Health and Safety Advisor must:
- Ensure that workers are provided with continuous education and training on health and safety matters
  - Oversee Tower's health and safety representatives, fire wardens, first aid officers and health and safety committee
  - Ensure comprehensive and appropriate reporting and investigation of health and safety matters to management and the Board
  - Manage Tower's relationship with WorkSafe, including in the case of notifiable events
  - In all other ways advise on compliance with the Act.

### ***Workers***

- 3.7 Tower workers must not act in a manner that intentionally jeopardises their own, or another person's health or safety.

- 3.8 Tower workers should proactively mitigate any risks that may affect their own health and safety, or the health and safety of others, as far as they are reasonably able to do so. Such health and safety risks and mitigating actions may include, but are not limited to:
- eliminating physical hazards in the workplace
  - reporting any health and safety hazards, incidents, injuries or 'near-miss' incidents in accordance with reporting processes (see Beacon for more information)
  - taking sick leave to prevent contagion of an illness or to mitigate risk of worsening his or her own health by continuing ordinary business activities at Tower
  - reporting incidents of harassment or bullying to their manager, the Health and Safety Advisor, or via the Whistleblower service (see Tower's Whistleblower Policy for more information).
- 3.9 Tower workers must comply with Tower's health and safety practices and procedures set out in this policy or any other policy issued from time to time. Policies include Tower's Code of Ethics and documents relating to diversity and inclusion.
- 3.10 Tower encourages all workers to participate in the conversation about Health and Safety. Any ideas for improvement to Tower's health and safety policies, processes or practices should be provided to Tower's Health and Safety Representatives, Committee or the Health and Safety Advisor.

## 4. Reporting

- 4.1 The Board will receive and consider a monthly health and safety report from management outlining health and safety risks, incidents, activities and any other relevant information.

## 5. Definitions

- 5.1 Terminology used in this Policy should be read consistently with the Act.
- 5.2 'Act' means the Health and Safety at Work Act 2015.
- 5.3 'Director' means a director of Tower.
- 5.4 'Officer' is defined in the Act and includes directors of Tower and any other person occupying a position that allows the person to exercise significant control over the management of Tower. For Tower's purposes, an 'Officer' is:
- Tower directors
  - Tower Executive Leadership Team
- 5.5 'PCBU' is a Person Conducting a Business or Undertaking and means Tower in the context of this Policy. It is further defined in the Act.
- 5.6 'Tower' means Tower Limited and its subsidiaries and related companies.
- 5.7 'Worker' is defined in the Act and for the purposes of this Policy includes employees, contractors, subcontractors, trainees, those on a work trial, volunteers etc, carrying out work for Tower.



## 6. Review

5.8 This policy will be formally reviewed every two years.