

ENVIRONMENTAL MANAGEMENT SYSTEM

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1. ENV001 Environmental Management System Scope / Context

1. ENVIRONMENTAL MANAGEMENT SYSTEM SCOPE

Proline Building Commercial Pty Ltd (Proline) is a wholly owned independent company, established with the aim of providing building construction and fit out work, to both the private and public sector, who demand responsive service and quality work.

Proline wants our clients to be impressed by our environmental performance; hence contracting Proline to carry out works over our competitors. To achieve this, we will demonstrate effective management of our environmental risks.

Proline decides to apply its environmental management system to its building, construction and fitout services only. Staff in the head office are expected to comply with the spirit of the environmental policy in the context of the organisation in which they work.

2. CONTEXT OF THE ORGANISATION

The context of the organisation has been reviewed identifying relevant interested parties, their needs/expectations, including any risks or opportunities associated with including the effects of climate change. Actions have been documented and will be reviewed during Management Review Meetings.

| The Organisation | Interested Parties | Needs / Expectations | Risks | Opportunities | Action |
|---|-------------------------------------|---|--|--|--|
| Company: Commercial construction – sole owner | Owner | Profitability return on investment and growth in market value of organization | Fail to be profitable | Increased growth | Increased training of employees - Systems - Programming |
| Clients: Small number / high profile | Clients/Customer | Expect high quality products Projects on time in budget, nil environmental penalties or damage Renewable Materials Carbon neutral products Sustainability of products | Fail to deliver projects on time, on budget and excessive defects and environmental penalties Harm to environment | Deliver on time in budget, high quality defect free, penalty / environmental harm free | Review project planning / job in progress procedures, identify early warning / programming / increased training in EMS |
| Key Employees: Managing Director / General Manager Workforce: 10-20 employees – varied ages | Senior Management Employee/s | Company must remain financially healthy, concerned with growth of company and EMS processes must be efficient Good work environment, fair | Fail to engage / promote system Incompetent employees / | Increased ownership of system Long term, happy, well | Increased training of employees - Systems - Programming Performance Reviews / Feedback to employees |

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|-------------------------|--|--|---|--|---|
| | | compensation and appropriate training, job security | high turnover of employees | trained, competent employees / rewards | Team building exercises Review training needs Increase training - Systems |
| Various / high turnover | Suppliers / Subcontractors | Expect to be paid promptly and need for company to clearly defined product/service requirements in P.O or contract | Breakdown in relationship, use of Security of Payments Act | Improve, foster ongoing relationships | Review Trade Contract Agreements / clearly define projects requirements prior. Review tender process |
| Accreditations | Certification Body | Level of compliance to ISO 14001 & others | Major Non conformances Loss of certification/s | Maintaining certifications | Maintain Resources - Dedicated Systems Manager |
| General Public | General Public | Maintain good community relationships/reputation Environmental protection Ethical behaviour Compliance with statutory and regulatory requirements | Poor reputation | Increase reputation | Review Corporate Social Responsibility Plan / Training in CSR / Ethics Auditing of projects to ensure compliance |
| Other Authorities | Local Councils Sydney Airport Corporation / Dept Infrastructure / EPA | Nil Environmental Damage / Control Environmental Hazards | Fail to control hazards / Fail to conform to legislative requirements | Increase reputation / Nil Penalties | Review project planning requirements / job in progress procedures, identify early warning / programming / increased training in EMS |

2. ENV002 Environmental Policy

1. LEADERSHIP & COMMITMENT

Proline's environmental policy and system is developed as a commitment from Top Management, or Senior Management and reflects the values and ethos of the organization in regards to Environmental Management.

Top Management retains accountability of the effectiveness of the EMS and ensures the commitments of the EMS are performed.

Commitments of Top Management include:

- Ensuring that the environmental policy and objectives are established and are compatible with the operations and the context of Proline;
- Ensuring the integration of the EMS requirements into Proline's business processes;
- Ensuring resources needed for the EMS are available and utilized;
- Ensuring the importance of environmental management and conformation to the EMS are effectively communicated;
- Ensuring the EMS achieves its intended outcomes;
- Directing and supporting all stakeholders (employees, subcontractors etc.) to contribute to the effectiveness of the EMS;
- Promoting continual improvement;

The policy and environmental system requirements is communicated to people working for or on behalf of Proline through staff company inductions and subcontractor site inductions, email alerts and is also available on Proline's server and website www.prolinebuilding.com.au

This information is also available to clients, suppliers, subcontractors and the general public.

2. ENVIRONMENTAL POLICY STATEMENT

Proline's commitment towards the environment and minimizing adverse effects on climate change is paramount. We continue to observe, monitor and maintain our system to comply with the regulations of the Environmental Protection Authority and all other relevant bodies. Proline Building believes in the necessity of maintaining a healthy and safe environment and protecting the environment is important to us. We have a duty to each other and the community to ensure we manage our activities in an environmentally responsible manner. The co-operation and dedication from all Proline employees is vital to achieving our environmental commitments. With the support of all Proline Senior Management, employees and sub-contractors, we are dedicated to:

- Protecting the environment and the prevention of pollution through all phases of our operations;
- Creating an environmentally aware culture within our clients, employees and sub-contractors through education, where responsibility is assigned and understood;
- To ensure compliance with relevant statutory environmental requirements and work in a manner that allows us to meet our general environmental duty;
- Ongoing implementation of the Environmental Management Program to achieve Proline's environmental targets and objectives;
- Ensure that the system is operational, effective and meeting the requirements, including legal and other requirements;
- Ensure the public has access to this Environmental Policy when required.



Managing Director
Scott Beynon

22.12.25
Date

3. ENV003 Planning

3.1 ENV004 Environmental Aspects

1. ENVIRONMENTAL ASPECTS

The purpose of this procedure is to identify the environmental aspects of Proline Building Commercial’s operations, work processes or services in order to determine those which may have a significant impact on the environment.

The relationship between environmental Aspects and environmental impacts is one of ‘cause and effect’. An environmental Aspect refers to an element of Proline Building Commercial’s operations, which can have a beneficial or adverse impact on the environment (such as a discharge, an emission, consumption or, reuse of a material, or noise). An environmental impact refers to the change that takes place in the environment as a result of the Aspect (such as pollution or contamination of water, or the depletion of a natural resource).

Each identified environmental aspect is subject to a qualitative risk analysis based on likelihood and consequences of environmental impact or impact on Proline’s environment-related issues. The Risk Rating of the impact for each Aspect will be measured on a rating system from 1 to 3, with 3 "non-existent" and 1 being the "most severe".

Things to consider in determining the Risk Rating of the impacts can include:

- What is the scale and/or significance of the impact?
- What is the probability and/or frequency of occurrence?
- What is the duration of the impact?
- Is there any potential regulatory or legal exposure?
- What would be the difficulty and/or cost of changing the impact?
- Is there any effect of change on other activities and processes?
- What are the concerns of the interested parties?

The risk analysis matrix is as follows:

The Risk Rating Matrix

| Likelihood | Consequence | | |
|-----------------|-------------|------------|-----------|
| | Major = 1 | Severe = 2 | Minor = 3 |
| Very Likely = 1 | Very High | High | Medium |
| Likely = 2 | High | Medium | Low |
| Less Likely = 3 | Medium | Medium | Low |

Very High: Widespread, irreparable environmental damage; loss of human life or long term human health effects; national attention; serious litigation; over \$1 million to manage consequences.

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High: Widespread, medium to long term impact; serious human health impacts; state-wide or national attention; major breach of legal requirements; major disruption to operations; Proline's reputation badly tarnished; \$100,000 to \$1 million to manage consequences.

Medium: Localised medium to long term impact; moderate contribution to climate change; moderate human health impacts requiring medical treatment; regional media attention; moderate breach of legal requirements with fine; \$1000 to \$100,000 to manage consequences.

Low: Limited impact to a local area but no long term effects; concern or complaints from neighbours; no injury to people; minor technical nonconformity but no legal nonconformity; less than \$1000 cost to for Proline to manage consequences.

Environmental aspects with a *Very High, High or Medium* risk are considered to be *significant*, that is, they have or can have a significant environmental impact.

Proline has reviewed all of its activities and services that it can control and influence and has identified all of its environmental aspects. These are listed in the **Register of Environmental Aspects Doc No: ENV020**.

3.2 ENV005 Legal Requirements

1. LEGAL & OTHER REQUIREMENTS

Proline Building Commercial Pty Ltd is subject to several legal requirements regarding its environmental aspects. It subscribes to the following:

- Environmental Defender's Office New South Wales (Ltd) eBulletin
- NSW Parliamentary Counsel's Office Weekly ebulletin
- Department of Sustainability, Environment, Water, Population and Communities
 - a. Water Matters Electronic newsletters
 - b. Waste Management Electronic newsletters
 - c. Ewaste Electronic newsletters
 - d. Dustwatch enews letters

And reviews the following websites on a quarterly basis:

<http://www.epa.nsw.gov.au>

www.envirolaw.org.au

www.environment.gov.au

www.environment.nsw.gov.au (Environment Climate Change and Water)

<http://www.edo.org.au/edonsw/site/factsheets.php>

which keeps us up to date with our environmental legal obligations, although Proline is also subject to several other non-legal requirements regarding its environmental aspects.

The Register of Legislation and Other Environmental References details the specific requirements applicable to Proline's activities, and shows how the requirements apply to Proline's environmental aspects. It is maintained by the Systems Manager, who is also responsible for reporting on changing legal and other requirements related to the Proline's environmental aspects in Senior Management Review Meetings.

Our legal and other requirements are taken into account in establishing, implementing and maintaining the environmental management system.

3. REGISTER OF LEGISLATION AND OTHER ENVIRONMENTAL REFERENCES

Legislation and environmental references have been used to establish measurable performance criteria. The table below lists the Issue and guidelines used.

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| Reference | Legislation and Guidelines Standards |
|----------------------|--|
| Acts | <ul style="list-style-type: none"> • Contaminated Land Management Act 1997 • Dangerous Goods (Road and Rail Transport) Act 2008 • Environmentally Hazardous Chemicals Act 1985 • National Environment Protection Council (New South Wales) Act 1995 • Protection of the Environment Operations Act 1997 • Protection of the Environment Administration Act 1991 • Waste Avoidance and Resource Recovery Act 2001 • Ozone Protection Act 1998 • Heritage Act 1977 • National Parks and Wildlife Act 1974 • Native Vegetation Act 2003 • Soil Conservation Act 1938 • Threatened Species Act 1995 • Traffic Act 1909 • Unhealthy Building Act 1990 • NSW- State Environmental Planning Policies (Infrastructure) 2007 • Transportation Administration Act 1988 • Airports Act 1996 |
| Regulations | <ul style="list-style-type: none"> • Contaminated Land Management Regulation 2013 • Dangerous Goods (Road and Rail Transport) Regulation 2009 • Protection of the Environment Administration Regulation 2012 • Protection of the Environment Operations (Clean Air) Regulation 2022 • Protection of the Environment Operations (General) Regulation 2022 • Protection of the Environment Operations (Noise Control) Regulation 2018 • Protection of the Environment Operations (Waste) Regulation 2014 • Airports (Building Control) Regulations 1996 (Cth) • Civil Aviation Safety Regulations 1998 (Cth) • Civil Aviation (Buildings Control) Regulations 1988 (Cth) • NSW EPA Waste Classification Guidelines (2014), PFAS National Environmental Management Plan HEPA 2020 |
| Australian Standards | <ul style="list-style-type: none"> • AS/NZS ISO 14001:2016 Environmental Management Systems • AS/NZS 4360:2004—Risk management • HB 203:2006—Environmental Risk management • |
| Guidelines / COP's | <ul style="list-style-type: none"> • NSW Environmental Management Systems Guidelines • Managing the Risks of Chemicals in the Workplace Code of Practice 2014 • Interim Construction Noise Guidelines – EPA 2009 |

3.3 ENV006 Objectives & Targets

1. OBJECTIVES & TARGETS

Objectives and Targets have been established by Senior Management to ensure that Proline meets customer and product or service requirements, legal and regulatory requirements, and continually improves its overall business performance. Environmental objectives are overall goals for environmental performance. Environmental targets are descriptions of how environmental objectives will be achieved within a specific timeframe and should be specific and measurable.

The Register of Environmental Objectives and Targets located in Table 1 below, also lists action plans and controls for achieving those objectives and targets, as well as key performance indicators (KPIs) to monitor progress in achieving the objectives and targets. The register is reviewed and revised each year in the Senior management review meeting, and reviews the extent to which objectives and targets have been met. Senior Management Reviews should take into consideration:

- Relevant findings from environmental reviews and audits
- Applicable legal and other requirements identification of environmental aspects and associated impacts;
- Technological, financial, operational, resources and other company requirements
- The views of employees, sub contractors, clients and other interested parties
- Effects of Climate Change

Objectives and targets will be achieved by having a trained and committed workforce who know, understand and support the operations of our Management System and make it work effectively on all sites and at all levels within the company.

Table 1. REGISTER OF ENVIRONMENTAL OBJECTIVES & TARGETS

| Aspect No | Aspect Description | Objective | Targets | Action Plan | Measurements (KPI) | Who | Carried Out |
|---------------|---|--|---|--|--|-----------------|---------------------------------|
| 18 | Excessive air quality omissions | Reduction of air omissions via air con | Reduce air omissions | Office - Ensure air filters are cleaned every three months | Clean air filters | Systems Manager | Quarterly |
| 18 | Excessive air quality omissions | Reduction of air omissions during construction works | Reduce air omissions | Site – Cover stockpiles, wet down stockpiles, excavation during windy weather, wetsaws in use where possible | Monthly Environmental Inspections complete per project | Systems Manager | Monthly |
| 8, 13, 14, 15 | Use of chemicals / Spills | Reduction in chemical use / No water contamination | No water contamination | Ensure chemical alternatives are sourced first. Choose biodegradable when possible, refuelling in bunded area. SW Drainage protection in place. Spill Kits in place during chemical usage | No of spills reported | Site Supervisor | Daily as Required |
| 19 | Water Quality – washing paint brushes etc on site | Reduce water contamination | No water contamination | Ensure all equipment is washed down in a designated area, clear from stormwater drains, sewers | No cleaning of equipment which leads to waterways / No of spills reported / No of Incidents reported | Site Supervisor | Daily as Required |
| 17 | Excessive waste on sites | Recycle of Building Materials Diversion of materials to landfill | Increase of building materials taken to recycle depots | Raise awareness through training of truck drivers and labourers removing waste from sites to recycle, separate wastes etc | Measurement by waste disposal receipts- wrap reports | Systems Manager | Monthly |
| 21 | Erosion and Sediment Control | Reduce erosion and sediment control on construction sites / reduce water runoff into SW drains | Increased use of monitoring documents by Site Supervisor / Managers | Development and implementation of ESCP on all major projects (over \$250k), or projects that have excavation work activities. Training of all personnel, ongoing monitoring of the ESCP / Controls to be carried out as part of the Site Induction | No of Daily inspections / No of Monthly Inspections complete / | Site Supervisor | Each Project / Daily Monitoring |
| 23 | Noxious Weed Control | Reduce noxious weeds growing on site | Increased use of monitoring documents by Site Supervisor / Managers | Development and implementation of EMP on all major projects (over \$250k), or projects that have a high risk of potential noxious weed growth. Training of all personnel, | No of Daily inspections / No of Monthly Inspections complete / | Site Supervisor | Daily Monitoring |

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|--|--|--|--|---|--|--|--|
| | | | | ongoing monitoring of the Weed Management/ Controls to be carried out as part of the Site Induction | | | |
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4. ENV007 Implementation

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4.1 ENV008 Resources

1. RESOURCES

Proline's management has identify and provided appropriate resources for Management and supervision, performance of work, checking and verifying activities, and to ensure effective implementation and improvement of our Environmental Management System.

These resources include people, infrastructure and the work environment, considering the appropriate amount and type of personnel, tools and equipment, storage space, materials, facilities, finances and time.

The Systems Manager has responsibility for overall co-ordination of the environmental management system in accordance with the requirements of AS/NZS ISO 14001 and reporting its performance, including recommendations for improvement, to Senior Management for review. The specific tasks associated with this role include:

- Maintenance of the Register of Environmental Aspects
- Maintenance of the Register of Legal and Other Requirements
- Maintenance of the Register of Environmental Objectives and Targets
- Maintenance of the Responsibility Matrix, including records of competence requirements, competence possessed, training needs, training plans and training undertaken
- Assessment of general environmental awareness of staff and contractors
- Control of documents, forms and records required by the EMS
- Co-ordination of environmental monitoring and measurement
- Evaluation of compliance with legal and other requirements relevant to the EMS
- Management of the internal audit program
- Co-ordination of corrective and preventive action
- Maintenance of the emergency preparedness and response procedure and management of testing the procedure
- Co-ordination of management review of the EMS

Various positions in the organisation have roles, responsibilities and authorities for managing environmental aspects, action plans, programs and controls. All of these roles, responsibilities and authorities are documented in 4.2 Roles & Responsibilities.

4.2 ENV009 Roles & Responsibilities

1. ROLES & RESPONSIBILITIES

1.1 Managing Director: (Scott Beynon)

Responsibilities include:

- Setting Policies, objectives, priorities & targets
- Define environmental roles and responsibilities for all personnel
- Reviewing Objective & Targets
- Resource allocation (including human, technical & financial)
- Monitor resource results and adjust allocations to suit where necessary
- Participate in Senior Management review
- Ensure the use of appropriate technology and management practices
- Promote compliance to maintain legal requirements;
- Promote compliance with the NSW Environmental Management Systems Guidelines are meet;
- Review and update the Environmental Management's Policy per anum
- Support and encourage open communication between senior management, employees, sub-contractors, unions, consultants and other relevant parties;
- Ensure ongoing training is available for Project Managers in regards to environmental management and associated risk management;
- Enhance the skills of workers through workplace and industry training.

1.2 Environmental Manager (Systems Manager): (Michelle Murphy)

Responsibilities include:

- Participate in Senior Management review
- Implementing programs for achieving set objectives & targets
- Monitoring and measurement of environmental performance
- Overall responsibility for system implementation & conformity
- Ensure compliance with environmental legislation, regulations and approval/permit/licensing conditions
- Keep abreast of changes in legislation and regulations
- Acquire and communicate/ disseminate environmental management information
- Conduct training and re-fresher training in environmental management
- Promote the Environmental Management System is implemented and ensure compliance is maintain in regards to legal requirements;
- Promote compliance with the NSW Environmental Management Systems Guidelines are meet;
- Support and encourage open communication between senior management, employees, sub-contractors, unions, consultants and other relevant parties;
- Maintain Environmental Management Records including;
 - Maintenance of the Register of Environmental Aspects
 - Maintenance of the Register of Legal and Other Requirements

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- Maintenance of the Register of Environmental Objectives and Targets
- Maintenance of the Responsibility Matrix, including records of competence requirements, competence possessed, training needs, training plans and training undertaken
- Assessment of general environmental awareness of staff and contractors
- Control of documents, forms and records required by the EMS
- Co-ordination of environmental monitoring and measurement
- Evaluation of compliance with legal and other requirements relevant to the EMS
- Management of the internal audit program
- Co-ordination of corrective and preventive action
- Maintenance of the emergency preparedness and response procedure and management of testing the procedure
- Co-ordination of management review of the EMS
- Develop a corrective action plan if desired targets and objectives are not being met through the review and evaluation procedure;
- Report to Senior Management in regards to corrective action and follow up including recommendations for improvement;
- Communicate the Environmental Site Specific Management Plan, to Senior Management, Project Managers, Project Supervisors, Foreman and other relevant employees;

1.3: Internal Auditor (Adam Kalocsai)

Responsibilities include:

- Awareness of Environmental Policy & EMS
- Developing internal audit program in liaison with Systems Manager;
- Conducting internal audits as per schedule;
- Training other internal auditors

1.4 Project Managers / Project Supervisor: (Various)

Responsibilities include:

- Awareness of Environmental Policy & EMS
- Assess service providers / subcontractors abilities to conform with environmental management requirements
- Ensure compliance is maintained in regards to legal requirements
- Support the Objectives and Targets in regards to Environmental Management;
- Review and sign off Environmental Site Specific Plans, prior to implementation;
- Support and encourage open communication between senior management, employees, sub-contractors, unions, consultants and other relevant parties;
- Assist in the maintaining of Environmental Management Records;
- Assist in the training of Site Supervisor and site staff in regards to environmental management and associated risk management;
- Assist in the implementation of the Environmental Site Specific Management Plan;
- Assist in the monitoring, review and evaluation of the Environmental Site Specific Management Plan;
- Assist in the development of a corrective action plan if desired goals, targets and objectives are not being met through the review and evaluation procedure;
- Report to the Systems Manager and Senior Management in regards to corrective action and follow up;

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- Communicate the Environmental Site Specific Management Plan to Site Supervisor and other relevant employees;
- Encourage and assist sub-contracts to develop an Environmental Management System and Standard Operating Procedures.
- Assess and monitor sub-contractors ability to meet their environmental obligations.

1.5 EMS Representative:

Responsibilities include:

- Awareness of Environmental Policy & EMS
- Implementing program for achieving set Objective & Targets
- Helping in Monitoring and measurement
- Training respective staff in implementing the waste management strategy

1.6 Site Supervisor/s: (Various)

Responsibilities include:

- Awareness of Environmental Policy & EMS
- Developing waste management strategy and implementation procedures on site
- Monitoring and measurement
- Ensure site specific induction has been carried out incorporating environmental management;
- Support and understand the Targets and Objectives in regards to Environmental Management;
- Support and work in accordance with the Environmental Site Specific Management Plan;
- Train employees in the Environmental Site Specific Plan.
- Identify competent personnel to carry out work activities who are competent in environmental aspects and impacts;
- Support and participate in open communication between senior management, employees, sub-contractors, unions, consultants and other relevant parties;
- Support the highest standards of workplace health and safety;
- Carry out work to a high level of workmanship;
- Maintain work standards and practices;
- Clean up work area in accordance with the Environmental Site Specific Management Plan
- Maintain Environmental Records as required.

1.7 Tradesmen/Apprentices/Labourers (Staff): (Various)

Responsibilities include:

- Awareness of Environmental Policy & EMS
- Conform to the waste management strategy procedures on site
- Ensure site specific induction has been carried out incorporating environmental management;
- Support and understand the Targets and Objectives in regards to Environmental Management;
- Support and work in accordance with the Environmental Site Specific Management Plan;

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- Support and participate in open communication between senior management, employees, sub-contractors, unions, consultants and other relevant parties;
- Support the highest standards of workplace health and safety;
- Carry out work to a high level of workmanship;
- Maintain work standards and practices;
- Clean up work area in accordance with the Environmental Site Specific Management Plan
- Maintain Environmental Records as required.

4.3 ENV010 Competence, Training & Awareness

1. COMPETENCE, TRAINING & AWARENESS

Success of the Environmental Management System will only be achievable if the person/s responsible for the implementation and review are thoroughly familiar with the contents, interpretations and performance criteria. Senior Management of Proline Building Commercial Pty Ltd will be responsible for the appointment of the Systems Manager who shall provide adequate training, incorporating environmental awareness for all Project Managers / Site Supervisor and staff, who then shall be required to carry out Environmental training during project site-specific inductions to subcontractors.

For each person in each position and role, competence possessed, training needs, and training or other personal development undertaken to acquire the required competence are also recorded in the Environmental Training Matrix. Copies of education and training qualifications are maintained in HR personnel files.

The Environmental Training Matrix is updated each quarterly with changes to positions, roles and staff, and training or other personal development undertaken.

General awareness of the organisation's environmental management system is propagated through an EMS training package provided during the company induction of staff, as well as in refresher sessions. General EMS awareness is assessed following the induction and refresher sessions, and records of assessment are maintained in the HR records. It is important that all personnel are familiar with the procedures of reporting on issues that may result in environmental degradation. As a minimum all project personnel must be familiar with the Environmental Management System and be aware of:

- The importance of conformance with the environmental policy and procedures and with the requirements of the Environmental Management System;
- The significant environmental impacts, actual or potential, of their work activities and the environmental benefits of improved personal performance;
- Their roles and responsibilities in achieving conformance with the environmental policy and procedures and with the requirements of the environmental management system, including emergency preparedness and response requirements, and
- The potential consequences of departure from specified operating procedures.

Environmental training may include the following:-

- Industry induction (Construction Industry Induction Card)
- Company Induction
- Site Specific Induction Training
- Familiarization with the site environmental training, environmental aspects, significance of impacts, controls, emergency response
- Site Specific Environmental Training (ie, Waste Management Control Training)

Personnel performing tasks that can cause significant environmental impacts shall be competent on the basis of appropriate education, training and/or experience. The Systems Manager, Project Manager or Site Supervisor shall determine whether an employee is competent enough to perform these tasks.

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Senior Management will review and revise the Environmental Training Matrix annually, to ensure that the training needs of Proline Building Commercial Pty Ltd employees are accurately being identified, effectively being met and that competency is achieved and maintained. Documentation and tracking of training records for each employee will be organized and maintained by the Systems Manager on an ongoing basis.

2. ENVIRONMENTAL TRAINING & RESONSIBILTIES MATRIX

| Role / Position Title/Position no. | Name | Responsibilities | Qualifications/ competency | Training needs | Planned dates | Remarks |
|---|-----------------|---|---|---|----------------------|--|
| Managing Director | Scott Beynon | <ul style="list-style-type: none"> Setting Policies, objectives, priorities & targets Define environmental roles and responsibilities for all personnel reviewing Objective & Targets Resource allocation (including human, technical & financial) Monitor resource results and adjust allocations to suit where necessary Participate in Management review Ensure the use of appropriate technology and management practices | Senior Business Administrator | EMS awareness (in house) | Complete / Scheduled | Re-fresher August 2011 Re-fresher May 2012 Re-fresher August 2013 Re-fresher July 2015 Re-fresher Sept 2017 Re-fresher scheduled Oct 2018 Re-fresher Feb 2019 Updated Proline Online Site Inductions 2021 / 2022/2023/2024/2025 |
| Systems Manager (Management representative) | Michelle Murphy | <ul style="list-style-type: none"> Participate in Management review Implementing programs for achieving set objectives & targets Monitoring and measurement of environmental performance Overall responsibility for system implementation & conformity Ensure compliance with environmental legislation, regulations and approval/permit/licensing conditions Keep abreast of changes in legislation and regulations Acquire and communicate/ disseminate environmental management information Conduct training and re-fresher training in environmental management | Certificate of Attainment in Environmental Management Systems (ISO 14001) | Certificate of Attainment in Environmental Management Systems (ISO 14001) | June 19 / Scheduled | Re-fresher August 2011 Re-fresher May 2012 Re-fresher August 2013 Re-fresher July 2015 Re-fresher Sept 2017 Re-fresher scheduled Oct 2018 Re-fresher Feb 2019 Updated Proline Online Site Inductions 2021 / 2022/2023/2024/2025 |

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| Internal Auditor | Adam Kalocsai | <ul style="list-style-type: none"> Developing internal audit program in liaison with Systems Manager Conducting internal audits as per schedule Training other internal auditors | Certified (RABQSA) lead auditor | EMS Awareness (in house) Ongoing Email Alerts Auditing Course | | |
| EMS Representative | Site Supervisor | <ul style="list-style-type: none"> Awareness on Policy & EMS Implementing program for achieving set Objective & Targets Helping in Monitoring and measurement Training respective staff in implementing the waste management strategy | EMS administration | EMS Awareness (in house) Ongoing Email Alerts | Complete / Scheduled | Re-fresher August 2011 Re-fresher May 2012 Re-fresher August 2013 Re-fresher July 2015 Re-fresher Sept 2017 Re-fresher scheduled Oct 2018 Re-fresher Feb 2019 Ongoing through Site Inductions Updated Proline Online Site Inductions 2021 / 2022/2023/2024/2025 |
| Project Managers | Various | <ul style="list-style-type: none"> Assess service providers / subcontractors abilities to conform with environmental management requirements Purchasing raw materials that comply with internal environmental requirements | Procurement Management | EMS Awareness (in house) Ongoing Email Alerts | Complete / Scheduled | Re-fresher August 2011 Re-fresher May 2012 Re-fresher August 2013 Re-fresher July 2015 Re-fresher Sept 2017 Re-fresher scheduled Oct 2018 Re-fresher Feb 2019 Ongoing through Site Inductions Updated Proline Online Site Inductions 2021 / 2022/2023/2024/2025 |
| Waste Management Coordinators / Site Supervisor | Various | <ul style="list-style-type: none"> Developing waste management strategy and implementation procedures on site Monitoring and measurement | Site Supervisor | Waste minimisation / management principles awareness (In house) Ongoing Email Alerts | Complete / Scheduled | Re-fresher August 2011 Re-fresher May 2012 Re-fresher August 2013 Re-fresher July 2015 Re-fresher Sept 2017 Re-fresher scheduled Oct 2018 Re-fresher Feb 2019 |

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| | | | | | | Ongoing through Site Inductions Updated Proline Online Site Inductions 2021 / 2022/2023/2024 |
| Staff | | <ul style="list-style-type: none"> Awareness on Policy & EMS | N/A | EMS Awareness (in house) Ongoing Email Alerts | Complete / Scheduled | Re-fresher August 2011 Re-fresher May 2012 Re-fresher August 2013 Re-fresher July 2015 Re-fresher Sept 2017 Re-fresher scheduled Oct 2018 Re-fresher Feb 2019 Re-fresher 2023 Re-fresher Jan 2025 Ongoing through Site Inductions Updated Proline Online Site Inductions 2021 / 2022/2023/2024/2025 |

4.4 ENV011 Documentation

1. DOCUMENTATION

Proline is committed to providing a safe and environmentally friendly workplace for employees, subcontractors and visitors. To meet our obligation under the Environmental Protection Act 1994 & NSW Environmental Management System Guidelines, Proline recognizes that documentation is critical for the success of Proline's Environmental Management System (EMS). Of equal importance are the processes for the identification, collection, filing, maintenance, storage and disposal of Environmental records produced by the EMS.

2. Purpose

The purpose of this procedure is to provide guidelines for creating Environmental documentation, as well as the record keeping requirements for records produced by the EMS.

3. Scope

The scope of this procedure applies to all EMS documents and records created as part of Proline's EMS.

4. Definitions

"Record" includes any form in which information is stored on a permanent basis or form which information may be reproduced. Records include both hard copy and electronic records.

5. Roles & Responsibilities

5.1 Systems Manager

The Systems Manager has overall responsibility for the development of documentation and recording keeping for the EMS.

5.2 Project Managers / Supervisors

Project Managers / Supervisors are responsible for ensuring that Environmental records are submitted to the Systems Manager so identification, collection, filing, maintenance, storage and disposal can be undertaken.

5.3 Site Supervisor / Supervisors

Site Supervisor is responsible for ensuring that Environmental records are submitted to their Project Managers/Supervisors so identification, collection, filing, maintenance, storage and disposal can be undertaken.

A detailed list of Environmental Responsibilities can be found in 4.2 Roles & Responsibilities.

6. Document Control

All Proline EMS Documents are controlled. A “controlled” document for which distribution and status must be kept current by the issuer, to ensure that authorised users have available the most up to date version.

6.6.1 Document Control Register

The Document Control Register Doc No: ENV021 is to be completed and maintained, by the Systems Manager. This Register includes the following information:

- Document Number
- Document Title
- Initial Issue Date
- Current Version Number
- Current Version Date
- Next Review Date

6.6.2 Location of EMS Documents

EMS Documents are located on the Proline Server under Environmental as templates to ensure changes to the documents cannot occur. For employees/subcontractors who do not have access to the Proline Server hardcopies of procedures and guidelines are made available by the Systems Manager.

6.6.3 Document Review

Annual reviews of the Document Control Register Doc No: ENV021 is carried out during the overall EMS Review in November of each year and any changes or corrective actions to these documents shall be recorded and communicate to all employees / end users via 7.4 Communication of Proline’s WHS Management System.

Minor changes including grammar and spelling are not deemed as content change and therefore these are exempt from the Consultation procedure.

6.6.4 Obsolete Documents

Obsolete Documents are those documents which are no longer applicable, required, replaced or superseded. Obsolete documentation will be removed from the Proline Server, although will be retained electronically by the Systems Manager.

7. Document Review & Evaluation

In order to ensure this procedure remains effective, it will be reviewed by Senior Management on an annual basis or in the event of changes in legislation or if raised by an employees concern.

4.5 ENV012 Operational Control

1. OPERATIONAL CONTROL

Documented standard operating procedures have been devised on the basis of risk to control operations associated with significant environmental aspects, including the significant environmental aspects of goods and services used by Proline.

| Document Number | Title |
|------------------------|-------------------------------------|
| SP01 | Soil & Water Management |
| SP02 | Community Consultation & Complaints |
| SP03 | Concrete Washout |
| SP04 | Dust & Air Quality |
| SP05 | Flora & Fauna |
| SP06 | Fueling & Servicing |
| SP07 | Heritage |
| SP08 | Noise & Environment |
| SP09 | Storage & Chemical Fuels etc |
| SP10 | Traffic & Pedestrian Management |
| SP11 | Contamination |
| SP12 | Waste Management |
| SP13 | Sustainability |
| SP14 | Weed Management |

These standard operating procedures are also listed in the ENV021 Document Control Register.

During the Planning stage of a project, reference should be made to Proline’s WHS Management System, section 6.0 Planning. This set of procedures for Design Control, Purchasing & Subcontracting, should be utilised during throughout the project to ensure environmental aspects are addressed during design and engagement of service providers or subcontractors.

4.6 ENV013 Emergency Preparedness & Response

1. EMERGENCY PREPARENESS & RESPONSE

Environmental emergencies and accidents are regarded as environmental nonconformities. Accordingly, in the event of an occurrence, immediate action is taken to mitigate the environmental impact, followed by corrective action to avoid a recurrence.

It has been noted that an emergency response procedure needs to be developed and implemented to be utilised in the event of an environmental emergency for each project. An environmental emergency is an event that causes or has the potential to cause harm to the environment. This procedure needs to include the following items:-

- Names of key personnel and contact telephone numbers;
- Contact details for emergency services;
- The location of on site information (SDS and Hazardous Substance Register);
- The procedure for notifying the relevant authorities.

This procedure is to be reviewed prior to its implementation to site-specific projects and furthermore an overall review yearly to assess the procedures effectiveness.

The emergency response procedure is tested on each site using the WHS Management Systems Evacuation Checklist. Planned tests are recorded in a Register of Emergency Evacuation Response Tests.

The table below lists an example of an Emergency Response Procedure

Table 1

| EMERGENCY RESPONSE PROCEDURE | |
|---|---|
| Project | Smith Road Community Centre |
| Address | 144 Smith Road, Smithville NSW, 2000 |
| Emergency Contact | Site Supervisor – Joe Bloggs. 0400 000 000 (contactable 24hours) |
| ON SITE INFORMATION | |
| Item | Location on site |
| Material Safety Data Sheets (MSDS Register) | In site office – Foreman to show actual location during site construction |
| Hazardous Substance | In site office – Supervisor to show actual location during site |

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| | | |
|--|--|--|
| Register | induction / also located on website | |
| Mobile Spill Control Kit | In site office - Supervisor to show actual location during site induction | |
| NOTIFICATION | | |
| Authority | Procedure | |
| Senior Management | Inform via telephone – immediate (24hour contactable) | |
| Systems Manager | Senior Management should inform Systems Manager – immediate (24 hour contactable, as deemed necessary) | |
| Environmental Protection Authority | Contact immediate | |
| Workcover Authority | Notify within 24 hours of incident | |
| Other relevant authorities | Should be contacted within the relevant time frames, ie Fire Explosion, fire department to be called immediately etc. | |
| Type of Emergency | Preparation for Emergency | Response to the Emergency |
| Minor spill of hazardous or toxic substance | <ul style="list-style-type: none"> • Awareness training of appropriate response and procedures to be incorporated into Environmental and Safety Induction • SDS on site for all materials and kept up to date • Adequate supply of absorbent materials and spill kits available in the site compound | <ul style="list-style-type: none"> • Report spill immediately to the Site Supervisor • Attempts to be made to limit or contain the spill using sand bags to construct a bund wall, use of absorbent material, temporary sealing of cracks or leaks in containers, use of geotextile or silt fencing to contain the spill. • Site Supervisor to coordinate the response, clean up and disposal of the material • Material to be disposed of in accordance with the manufacturers recommendations and applicable legislation |
| Major spill of hazardous or toxic substance | <ul style="list-style-type: none"> • Awareness training of appropriate response and procedures to be incorporated into Environmental and Safety Induction • SDS on site for all materials and kept up to date • Adequate supply absorbent materials to contain initial spill • Supplies available at the site compound • Emergency telephone numbers prominently displayed around office and issued to Site | <ul style="list-style-type: none"> • Report spill immediately to the Site Supervisor and Systems Manager • Contact local Hazmat crew as required • Attempts to be made to limit or contain the spill using available resources such as deploying absorbent material, temporary sealing of cracks or leaks in containers, creating bunds, use of geotextile or silt fencing to contain the spill, righting overturned containers, |

| | | |
|----------------------------|--|--|
| | <p>Foremen</p> | <p>transferring remaining material to a secure location.</p> <ul style="list-style-type: none"> • Implement procedures to notify the relevant authorities. • Site Supervisor to coordinate the response, clean up and disposal of the material • If spill is regarded to be outside the onsite resources, then the fire brigade should be called • Where appropriate, evacuation procedures are to be implemented to remove non-essential personnel from the affected area • The Client Principal is informed of the incident • Access and egress to the area is established to ensure the appropriate vehicles have effective access and congestion is minimised. • If the Hazmat Crew or other authority attends, their senior officer assumes control of the operation with Proline and subcontractor personnel assisting as required. • A full investigation report of the event is to be completed by the Project Manager as soon as practicable after the area has been secured. |
| <p>Flood</p> | <ul style="list-style-type: none"> • Evacuate all nonessential personnel • Remove computer, electrical equipment and files from office to higher ground • Remove plant and equipment from potentially affected areas and away from watercourses • If plant cannot be removed ensure it is secured and in a position where it is unlikely to cause damage • Awareness training of appropriate response and procedures to be incorporated into Environmental and Safety Induction • Monitor flood warnings | <ul style="list-style-type: none"> • Stow all minor and small equipment into containers that are to be sealed. • Containers to be removed to above 1 in 100 year flood level. • Ensure all other materials are removed or stowed and secured away from watercourses and other potentially affected areas • All chemicals to be in secured containers and stored within a sealable shipping container • Remove plant and equipment to above the 1 in 100 year flood level or as directed. |
| <p>Severe Storm</p> | <ul style="list-style-type: none"> • Awareness training of appropriate response and | <ul style="list-style-type: none"> • Evacuate all nonessential personnel. |

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| | | |
|--|--|---|
| | <p>procedures to be incorporated into Environmental and Safety Induction</p> <ul style="list-style-type: none"> • Monitor cyclone/storm warnings for the area • Ensure First Aid supplies are well stocked and adequate | <ul style="list-style-type: none"> • Secure plant and equipment in sheltered location. • Stow all minor and small equipment into containers, which are to be sealed. • Remove computer, electrical equipment and files from office to higher ground • Remove plant and equipment from the immediate foreshore to above 1 in 100 flood level • Ensure all other materials are either removed from foreshore or stowed and secured. • <i>All chemicals to be in secured containers and stored within a sealable shipping container, shipping container to be removed to above 1 in 100 flood level.</i> |
| <p>Fire (other than bushfire)</p> | <ul style="list-style-type: none"> • Awareness training of appropriate response and procedures to be incorporated into Environmental and Safety Induction • Fire extinguishers maintained, clearly labelled and distributed around site compound and vehicles • Training in the use of fire extinguishers and which one to use for each type of fire • First Aid supplies are stocked and adequate | <ul style="list-style-type: none"> • For small fires, attempts to be made to extinguish the fire or limit its spread with available fire extinguishers or water hoses if appropriate. • A supervisor is to be informed immediately. • The Supervisor will contact the Site Supervisor who will arrange for external services (fire, ambulance) to be advised as a precautionary measure. • The Client shall be informed. • Where external services attend, their senior officer assumes control of situation • All personnel in the vicinity to be assembled in the Evacuation Assembly Area and a head count performed • Any resulting fuel or chemical spill to be handled as detailed above • Site Manager to coordinate with emergency services and provide assistance as required. |
| <p>Bush fire</p> | <ul style="list-style-type: none"> • Awareness training of appropriate response and procedures to be incorporated into Environmental and Safety Induction • Fire extinguishers maintained, clearly labelled and distributed around site compound and | <ul style="list-style-type: none"> • External services (fire, ambulance) to be contacted. • All personnel in the vicinity to be assembled in the Evacuation Assembly Area and a head count performed. • All plant and equipment to be secured |

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| | | |
|--|--|--|
| | <ul style="list-style-type: none"> vehicles • Monitoring of bushfire warnings and updates • First Aid supplies are stocked and adequate | <ul style="list-style-type: none"> • All fuels and chemicals to be stored and secured within hazardous container. • Project Manager / Site Supervisor to liaise with the Client and emergency personnel and provide assistance as required • All nonessential personnel to be evacuated from the site on advice from emergency personnel. |
|--|--|--|

EMERGENCY CONTACT NUMBERS

| Emergency Situation | Contact Who | Telephone Contact Details |
|---|---|---|
| Environmental Emergency | Emergency Controller | 1300 141 103 |
| Pollution Incident | DECC | 131 555 |
| Fire | Fire Brigade | 000 - no mobile service 112 |
| Medical Emergency | Ambulance | 000 – no mobile service 112 |
| Medical Emergency - Poison | Poison Info Line | 131 126 |
| Car Accident | Police / Ambulance | 000 – no mobile service 112 |
| Bomb Threat | Police | 000 – no mobile service 112 |
| Explosion | Fire / Police / Ambulance | 000 – no mobile service 112 |
| Gas Explosion (Bottle) | Fire / Ambulance | 000 – no mobile service 112 |
| Gas Explosion (Line) | Fire / Police / Ambulance Gas Company – AGL Gas Company – ELGAS Gas Company – Origin Energy | 000 – no mobile service 112 131 909 1800 819 783 1800 808 526 |
| Storms / Winds /Floods | State Emergency Services | 132 500 |
| Earthquake | State Emergency Services | 132 500 |
| Terrorism Activities | Police National Security Hotline | 000 – no mobile service 112 1800 123 400 |
| Chemical Spill / Oil Spill | | 1300 664 266 / Hazmat 000 |
| Electrical Faults | Energy Australia Integral Energy Country Energy | 131 388 131 003 13 23 56 |
| Water Mains - Burst | Sydney Water | 13 20 90 |
| Height Rescue (Safety Harness Rescue) | Police Rescue Squad – (PRS) Vertical Rescue Accredited Unit Ambulance Fire Brigade | 000 – no mobile service 112 000 – no mobile service 112 000 – no mobile service 112 |
| Non English speaking person - Serious (life threatening) emergencies - Translating / Interpreting Service | Translating / Interpreting Service (TIS National) | 131 450 |
| Trauma Counseling | Counseling Sydney | 0416 0416 99 |

4.7 Communication

Proline Building Commercial Pty Ltd, encourages open communication throughout the organisation, thus ensuring effective implementation of all Management System procedures, in compliance with the associated objectives.

This is maintained through Management and staff meetings, in conjunction with memo's, email's and informal meetings. Communication for particular projects is also of utmost importance with regular project review meetings with both internal and external project personnel being carried out.

Through the company policies, objectives and meeting opportunities, management communicates awareness and the importance of determining and meeting client requirements and ensuring their satisfaction, of meeting statutory and regulatory requirements and that all personnel contribute to achieving the company's goals and objectives.

Proline Building Commercial Pty Ltd promotes communication between the above through various medians. The following table outlines the various medians Proline Building uses to ensure open communication is obtained.

Communications Matrix

| Median | Target Audience | Frequency | Notes |
|---|---|-----------------|--|
| General | | | |
| Telephone | All | As required | Diary Documentation if decisions are made |
| Facsimile | All | As required | A copy must be retained for files |
| Email E-Bulletins Safety Alerts | All | As required | |
| General Letter Correspondence (Mail) | All | As required | A copy must be retained for files |
| Memorandums | All | As required | Email out to all required |
| Face to Face | All | As required | Diary Documentation if decisions are made |
| Site Signage / Posters | All | On each project | To be displayed in Site / Lunch Sheds |
| Environmental Plans including Evacuation Plans | All | On each project | WHS Plans to be communicated through Induction Evacuation Plan to be displayed |
| Inductions | All | On each site | Online inductions via website Communicated by the Site Foreman – Site Induction Records |
| Meetings | | | |
| Project Meetings | Project Team | As required | Informal meetings, diary notes if required |
| Project Team Meetings | Client, Builder, Architect, Sub Consultants | As required | Meeting Minutes are documented & distributed |
| Toolbox Meetings including aspects regarding Environmental Issues | Site Supervisor– All on site | Weekly | Meeting Minutes are documented & available in site office for review |
| Informal Meetings | Site Manager Sub-contractors, | As required | Diary Notes taken |

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| | | | |
|--|------------------------------------|-------------------------------|---|
| | site staff | | |
| Internal | | | |
| Office Meetings – Management Review Meetings | Proline Senior Staff | As required (12 monthly) | Meeting minutes are documented |
| Health & Safety, QA & Environmental Seminar Training | Proline Staff Only | As required (12 monthly) | Internal Health & Safety Seminar Training |
| Subcontractors | | | |
| Project Tender Clarification & Site Specific Requirements Review Meeting | All Subcontractors | Prior to commencement | Notes attached to Trade Contracts if required |
| Site Induction – Onsite Reviews | All Subcontractors | Prior to commencement | Site Induction Records |
| Request for Information | All Subcontractors | As Required | Email Requests |
| Progress Reports | All Subcontractors | Daily / Bi-weekly | Onsite Diary Notes Email – progress requests |
| Change In Tenders | All Subcontractors | As Required | Email Notifications – notification of changes |
| Subcontractor Safety Alerts | All Subcontractors | As Required | Email Safety Alert Memo's |
| Other | | | |
| Request for Information System | All / Client / Architect/ Engineer | As required | RFI System Logged & Reviewed (Refer to the Project Management Procedure for further information re: RFI System) |
| Newsletter | All | As required | Proline Buildings General Newsletter |
| Update Reports | Client | As required | Written document of project progress |
| Client Satisfaction Surveys or Client Generated Reports | Client | Generally per project | Satisfaction Survey, designed to open communication lines and assist in improving our service |
| Environmental Reporting Requirements | All | As issues raised by employees | Memo's / Corrective Action Notices to be issued |
| Enviro Statistic Reporting | All | Annually | Reporting Template issued Email to all |
| Subcontractor Consultation | All Subcontractors | Weekly | Weekly Site Safety Walks |
| Site Shed / Lunch Room Notice board | All | On each Project | Memo's / Safety Alerts / Site Rules / Hazardous Substance Register Posted Up |
| Safety Data Sheets | Person/s carry out the works | For each Hazardous Substance | Communicated through the Safe Work Method Statement |
| Incident /Accidents Notifiable Incidents | All Workcover NSW | As required | Memo's Online reporting forms |
| Changed Work Practices | Employees / Subcontractors | As required | Communicated through the Safe Work Method Statement Reviews Changed Safe Working Guidelines, Emails, Safety Alerts, Memo's, WHS Seminars |

5. ENV014 Measurement, Evaluation & Response

TABLE OF CONTENTS

5.1 Monitoring and Measuring Performance

5.2 Corrective & Preventative Action

5.3 Control of Records

5.1 ENV015 Monitoring

1. MONITORING

The purpose of this section is to establish and maintain documented procedures to monitor and measure the key characteristics of Proline Building Commercial Pty Ltd operations and activities that can have a significant impact on the environment.

Monitoring and measurement enables Proline Building Commercial Pty Ltd, to gauge its environmental performance, analyse root causes of problems, identify areas where corrective action is needed, improve performance and increase efficiency. In addition, pollution prevention and other strategic business opportunities are identified more readily when current data is available.

An annual Schedule of Environmental Monitoring and Measurement is used to record data on Proline's environmental performance on a monthly basis.

The Systems Manager is responsible for analysing the results of monitoring and measurement and reporting on the environmental performance of the organisation, in particular the extent to which environmental objectives and targets have been met, in the Senior management review meetings.

The Systems Manager is also responsible for ensuring that monitoring equipment is calibrated and maintained according to manufacturer specifications. In addition, the Project Managers will ensure that only properly trained personnel operate the monitoring equipment and records of training and calibration/maintenance records are maintained in accordance with Proline Building Commercial Pty Ltd Quality Management System where applicable.

Environmental Monitoring of site activities is carried out by the Site Supervisor / Manager on all construction sites by completing the Daily Site Checklist Doc No: WHS13 – this includes Environmental aspects required to be inspected on a daily basis.

The Monthly Environmental Checklist Doc No: ENV028 is required to be completed by the Site Manager or Project Manager for all major projects (value being over \$250k) monthly.

Review of these documents is carried out by the Systems Manager during the Site Audit Checklist Doc No: OHS030 and end of project review which is documented on the Project Review Register Doc No: OHS112 – Environmental Section.

2. COMPLIANCE EVALUATION

Once a year, the Systems Manager shall verify compliance with relevant statutory and regulatory requirements. This will be conducted through the annual internal auditing procedures. This is undertaken by completing a review of the 3.2 Legal Requirements table.

- Evidence required for compliance
- Evaluation of compliance (yes/no)

The register that is completed in this review or compliance audit becomes a record of the evaluation of compliance. Where non-compliance is detected, this is followed up with corrective action refer to 5.2 Corrective and Preventative Action Procedure below.

5.2 ENV016 Corrective & Preventative Action

1. CORRECTIVE & PREVENTATIVE ACTION

Any corrective or preventive action taken to eliminate the causes of actual and potential non-conformances shall be appropriate to the magnitude of the problems and commensurate with the environmental impact encountered.

The findings, conclusions and recommendations reached as a result of measuring, monitoring, audits and other reviews of the environmental management system will be documented, and the necessary corrective and preventive actions identified. The Systems Manager should ensure that these corrective and preventive actions have been implemented and that there is a systematic follow-up to verify their effectiveness.

Procedure

- It is the responsibility of all Proline Building Commercial Pty Ltd employees involved with the implementation of the Environmental Management System to utilise the "Non-conformance and Corrective and Preventive Action" procedures to report any Environmental problems or improvement opportunities.
- Knowledge of various problems or improvement opportunities could come about through:
 - Internal audit
 - External audit
 - Site inspections
 - Feedback from external parties
 - Complaints from customers or other stakeholders
 - Suggestions for improvement from staff and contractors
 - Occurrence of environmental emergencies and accidents
 - Testing of emergency preparedness and response
 - Management review

The process is initiated by filling out the Occupational Health & Safety Hazard Report Form Doc No: WHS032 from Proline WHS Management System.

- The form can be filled out directly by employees at Proline Building Commercial Pty Ltd for corrective or preventive actions that come to their attention. If a person from outside Proline Building Commercial Pty Ltd would like to report a corrective or preventive action, they can do so by contacting Proline's Systems Manager who will fill out a Hazard Report Form for them.

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- Once a Hazard Report Form is received by the Project Manager or Systems Manager, which has identified a problem or an improvement opportunity, he/she will assign investigation responsibility for each significant corrective/preventive action. It is not a requirement that every Hazard Report Form request, be acted upon immediately it is dependent on the severity. The Managing Director shall ensure that the allocation of staffing resources is appropriate to the magnitude of the problems (or improvement opportunities) and commensurate with the environmental impact encountered.
- The staff member who has been given the responsibility for the investigation into the Hazard Report Form will work to determine the significance and the root cause of the problem or improvement opportunity. Once the root cause has been determined, recommendations will be made. It is a goal of Proline to work to treat the causes of problems and not to treat only the symptoms.
- Based on the results of the investigation the Systems Manager and/or Project Managers will determine if the problem or improvement opportunity requires corrective or preventive action to be taken. If he/she determines that action is needed, then the Project Manager will have the ultimate responsibility for ensuring effective development and implementation of an action plan for that corrective or preventive action.
- Once the plan has been implemented, the Project Managers have the ultimate responsibility to verify that the proposed action was taken and to assess the effectiveness of that action. If the action is determined to be ineffective, then the action plan is to be reviewed, and any changes or modifications should be made in order to increase the chances of successfully resolving the original problem. If the action is determined to be effective, then the Hazard Report Form is closed and kept on record for future reference.
- The Hazard Report form is a multi-part form that requires the reporting of information at each step in the corrective/preventive action process. It is the responsibility of the staff member in charge of each step of the process to ensure that the required correct and detailed information is recorded on the form. In addition, it is the responsible staff member's obligation to guarantee that the form is routed to the appropriate people in a timely manner to ensure close out of the corrective or preventative action.

The Systems Manager is responsible for maintaining a Corrective Action / Issues / Improvements Register Doc No: QA010 by where the Environmental issue will be documented. Each record in this register is given a Corrective and Preventive Action Number for easy identification. Corrective and preventive action often requires changes to environmental system documentation. In such cases, this process feeds into the process for control of documents.

The Systems manager is then responsible for reporting on the status of corrective and preventive action in Senior management review meetings.

5.3 ENV017 Control of Records

1. CONTROL OF RECORDS

Records pertaining to a particular project or job may be provided to the customer for observation to show that their specified requirements have been achieved. For further information refer to Control of Records in the Quality System.

1.1 Controlled Documents (Records)

All Proline Environmental Documents are controlled. A “controlled” document for which distribution and status must be kept current by the issuer, to ensure that authorised users have available the most up to date version.

The Managing Director prior to issue will approve all documents controlled by Proline Building Commercial. All controlled documents are to be marked with the version date and listed on the Environmental Management System Document Control Register Doc No: ENV021.

2. Environmental Records Requirements

Environmental Records must be kept to monitor the effectiveness of the EMS. Records provide evidence that personnel are complying with the requirements of the system, standards, regulations and laws that apply. Project Managers will ensure at least the following records are kept:

- Training Records
- Site Induction Registers including skills, competency & license records
- Emergency Procedures
- Hazard Identification and risk assessments
- Incident investigation reports/statistics
- Plant and equipment records including servicing, maintenance testing records
- Work Permits / Approvals & General Environmental Checklists
- Performance targets and measurements
- Safety Data Sheets
- Hazardous Substances Records
- Inspections, Testing and Servicing Records
- Details of qualifications, held by individuals
- Internal review reports
- External Reports
- Minutes of workplace Environmental meetings/toolbox
- Consultation records
- Environmental design reviews
- Audit Reports
- Environmental Management System
- Site Specific Environmental Plans
- Safe Work Method Statements
- Site Safety Rules
- Corrective Actions Records
- Non conformances
- Management Site Environmental Inspections & sign off's
- Sign off of Non conformances / corrective actions

Table 1 Stored Record Requirement Register

| Type of Record | Archive Time |
|---|---|
| Training Records | 3 years after the person/s cease employment |
| Site Induction Registers & Training | 5 years |
| Emergency Procedures | 5 years |
| Hazard Identification and risk assessments | 5 years |
| Incident reports/statistics | 5 years |
| Plant and equipment records | Operating life of the plant |
| Risk Assessments | 5-30years |
| Work Permits / Approvals & General Environmental Checklists | 5 years |
| Performance targets and measurements | 7 years |
| Material Safety Data Sheets | 30 years if hazardous |
| Hazardous Substances Records | 30 years |
| Inspections, Testing and Servicing Records | 7 years |
| Details of qualifications, held by individuals | 3 years after the person/s cease employment |
| Internal review reports | 7 years |
| External Reports | 7 years |
| Minutes of workplace Environmental meetings/toolbox | 7 years |
| Safety equipment records | Operating life of the plant |
| Environmental design reviews | 7 years |
| Audit Reports | 7 years |
| Injury and workers compensation management records | 30 years |
| Environmental Management System | Ongoing |
| Site Specific Environmental Management Plans | 5 years |
| Safe Work Method Statements | 5 years |
| Site Safety Rules | 5 years |
| Corrective Actions Records / Register | 5 years |
| Job Files | 5 years |
| Any Worksafe notifications | 30 years |
| Health Surveillance Records | 30 years |
| Results of any air monitoring | 30 years |

3. Storing of Records

It is the Project Manager/Supervisors responsibility to ensure all records have been clearly labeled, filed and forwarded to the Systems Manager. Filing should occur within the Project File under a section clearly marked i.e. Site Induction Forms. Upon completion of the projects defects liability period, Project Managers/Supervisors should transfer all job files into an archive box, in turn clearly labeling, then store within the archive room, for a period of no less than 7 years. Project Managers/Supervisors should inform the Systems Manager, as to what they have archived, so this may be listed on the Archive Register Doc No: WHS084. It should be noted, that certain records are required to be kept for longer periods (up to 30 years as noted in Table 1 Stored Record Requirement Register), please refer to Hazardous Substances for further information.

3.1 Storing of Electronic Records

Electronic records are records, which are communicated and maintained by means of electronic equipment ie PC's. These records are backed up automatically by the Proline Server. The

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Systems Manager changes the backup drives daily and removes the current version off site. Files for specific projects are allocated to individual folders for easy retrieval.

Electronic records should be kept as long as required in accordance with the relevant legislation, regulations, business needs and archival purposes. Although, various Environmental Records are required to be kept for periods ranging from 5 to 30 years as noted in Table 1 Stored Record Requirement Register.

It should be noted that the electronic record keeping system operating on Proline Building Commercial Pty Ltd computers and related telecommunications systems are protected by criminal law provisions in computer crime laws and telecommunications interception laws.

3.2 Archiving & Review

Archiving of Records is the responsibility of the Systems Manager. Access to the records is restricted to those with a need to know and their confidentiality and security should be maintained at all times.

Various types of records are required to be kept for a period of up to 30 years. It is the Systems Manager duty to check legislation, regulations and statutory requirements in accordance with 3.2 Legal Requirements Procedure, which have been archived, need to be clearly indexed, so they can be successfully retrieved if recall is needed for example in the case of court action. The Archive Register Doc No: WHS084 is maintained for all Proline Records and audits of this register are carried out yearly.

3.3 Disposal

Disposal of Records should be carried out in accordance with regulatory requirements, so personal data (information) is not carelessly disregarded. Proline disposes of records through a secured recycling organisation – Wanless Enviro Services Pty Ltd.

6. ENV018 Review

6.1 ENV019 Internal & Management Review

1. INTERNAL & MANAGEMENT REVIEW

1.1 Internal Audit

The purpose of auditing is to:

- Ensure conformance with Proline Building Commercial Pty Ltd policies, systems and procedures,
- Ensure compliance with the international standard ISO14001 and other regulatory requirements;
- Assess the effectiveness of environmental activities;
- Evaluate the effectiveness of the Environmental Management System implementation,
- Promote understanding among employees, sub-contractors, clients, and
- Communicate information to Proline's Senior Management.

In order to achieve maximum improvement, the audit must be planned, establish facts, be based on objective evidence, be executed competently, and be reported constructively. The Systems Manager shall maintain records for a period of no less than 7 years.

The Systems Manager will prepare an internal audit schedule Doc No: WHS040. This schedule will be based on the importance of the environmental activities and the results from previous audits. Those activities that have higher importance or more impacts on the environment, and those activities that have had non-conformance problems in previous audits will be priorities in the scheduling of audits. Each area within the Environmental Management Plan will be audited at least once a year. The auditor should be proficient in both written and verbal communication skills and shall ensure objectivity and the impartiality of the audit process.

Audit criteria in the program include the requirements of AS/NZS ISO 14001 for environmental management systems, the requirements of this EMS manual, the requirements of work instructions listed in this manual to control operational activities associated with significant environmental aspects, and legal and other requirements.

An Internal Audit Checklist Doc No: ENV024 is used to record evidence for audits of the requirements of AS/NZS ISO 14001 and this EMS manual. Findings of such audits are reported using an Internal Audit Report Form Doc No: ENV025.

Non conformances raised in internal audits are entered into the Corrective Action / Issues / Improvements Log Doc No: QA10 and subject to appropriate corrective and preventive action.

1.2 Management Review Procedure

The "Environmental Management System Management Review" process is intended to provide a forum for discussion and improvement of the Environmental Management System. This process is also meant to provide management with a vehicle for making any changes to the Environmental Management System necessary to achieve Proline's environmental goals.

When:

At least once a year, Proline's Senior Management shall review the Environmental Management System to ensure its continuing suitability, adequacy and effectiveness. The management review process shall ensure that the necessary information is collected to allow management to carry out this evaluation. The review shall be documented with meeting minutes.

Who:

The Managing Director, General Manager & Systems Manager

What:

The Management Review shall address the possible need for changes to policy, objectives, targets and other elements of the environmental management system, in light of environmental management system audit results, changing circumstances and the commitment to continual improvement.

At a minimum, each "Environmental Management System Management Review" meeting will consider the following:

- The suitability, adequacy and effectiveness of the Environmental Policy
- The suitability, adequacy and effectiveness of the environmental objectives and targets
- The overall suitability, adequacy and effectiveness of the Environmental Management System
- The suitability, adequacy, and effectiveness of training efforts
- The results of action items from the previous "Environmental Management System Management Review" meeting
- Examine external communications from interested parties and any customer complaints for common threats that may highlight areas that need changing.
- Check for changes in relevant legislation - WHS, environment, etc and for new codes of practice that may impact upon Proline's methods of operating. Review all unusual incident reports generated since the last review.
- The status of all corrective and preventative actions
- Review of the Context of the Organisation
- Recommended changes to the Environmental Management System to ensure continual improvement
- Review of significant aspects
- Review of risks and opportunities for improvement