



Code of Conduct and Workplace Policies Manual

Beenleigh Steel Fabrications Pty Ltd, BSF
Mobile Cranes Pty Ltd and BSF Design
Solutions

Version 1
November 2025

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Code of Conduct		
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Policy context:	
Related Policies	Schedule 1 to Code of Conduct; Drug and Alcohol Policy Schedule 2 to Code of Conduct: Bullying, Harassment and Anti-Discrimination Policy Schedule 3 to Code of Conduct: Workplace Health and Safety Policy Internet, Social Media and Email Use Policy Unsatisfactory Performance, Misconduct, Discipline and Termination Policy Employee Complaints, Disputes and Grievances Policy Leave Policy Workplace Rehabilitation Policy
Legislation or Other Requirements	<i>Anti-Discrimination Act 1991 (Qld)</i> <i>Human Rights Act 2019 (Qld)</i> <i>Age Discrimination Act 2004 (Cth)</i> <i>Australian Human Rights Commission Act 1986 (Cth)</i> <i>Disability Discrimination Act 1992 (Cth)</i> <i>Racial Discrimination Act 1975 (Cth)</i> <i>Sex Discrimination Act 1984 (Cth)</i> <i>Privacy Act 1988 (Cth)</i>

1 Purpose

This Policy sets out Beenleigh Steel Fabrications Pty Ltd’s, BSF Mobile Cranes Pty Ltd’s and BSF Design Solutions Pty Ltd’s (the Employer’s) Code of Conduct to ensure all employees are aware of the standard of conduct and behaviour that is expected to be displayed at all times.

2 Scope

This Policy forms part of the Code of Conduct and applies to all employees, contractors, subcontractors and any other individuals engaged in work for the Company, regardless of their employment status or location of work.

3. Policy

The Employer’s Code of Conduct applies to all employees, contractors and sub-contractors of the Employer and assists them to undertake their work responsibilities legally and ethically while conforming to the Company’s values.

Specifically, in carrying out duties and responsibilities employees, contractors and sub-contractors must:

- Uphold the values of the Employer
- Comply with all laws relevant to the individual's areas of responsibility
- Comply with the Company's organisational policies, procedures, and standards
- Act in a manner that will not bring the Company into disrepute
- Promote and maintain confidence and trust in the work of the Company
- Ensure work is performed efficiently, effectively and safely
- Ensure individuals remain accountable for, and strive to improve, the quality of their work
- Work cooperatively, positively and respectfully with their colleagues, clients and others
- Ensure that the Company's resources are not used improperly.

Those bound by the Code of Conduct are required to demonstrate their commitment to:

- Meet standards of safety and service as per policies, procedures and legislation.
- Refrain from actions and behaviour that constitutes bullying, harassment or discrimination
- Not place themselves in a position whereby they could appear to be influenced by a personal interest, or where they may have a real or perceived conflict of interest. This may also constitute corrupt conduct
- Not make any public statement, whether written or verbal, on behalf of the Company without the prior approval of the General Manager or Director
- Uphold and demonstrate professional conduct at all times.

Breach or departure from the provisions of the Code of Conduct and any of its schedules may be grounds for disciplinary action as appropriate, which could include termination of employment for employees or termination of the contracting agreement for independent contractors.

4 Principles of the Code of Conduct

All organisations and businesses require clear rules and procedures governing conduct and responsibilities to ensure efficient operation and that employee and contractors understand the Employer's expectations. The following rules specify those actions which are prohibited and any, employees who fail to observe these rules and procedures will be subject to the Unsatisfactory Performance, Misconduct, Discipline and Termination Policy.

Please note that the following form part of this Code of Conduct: Schedule 1: Drug and Alcohol Policy, Schedule 2: Workplace Bullying, Harassment and Anti-Discrimination Policy and Schedule 3: Workplace Health and Safety Policy. Further, where an Employer policy or procedure exists, they must be read in conjunction with this Code of Conduct, even if the policy or procedure does not form part of this Code of Conduct.

4.1 Personal Behaviour

All employees, contractors and sub-contractors are expected to conduct themselves in a socially acceptable manner. Specifically, threats, abuse or physical violence are strictly prohibited. Any conduct, whether verbal or physical, which causes any other person to feel threatened, abused or in fear is also strictly forbidden. Provocation will not be accepted as an excuse.

Refer to the Unsatisfactory Performance, Misconduct, Discipline and Termination Policy for further information.

4.2 Bullying, Harassment and Anti-Discrimination

Bullying and harassment of any kind is not permitted. This includes sexual harassment, racial vilification and bullying. If an employee believes they have been subjected to harassment they must report the matter to the line Manager or to the General Manager if the Line Manager is directly involved.

Refer to Schedule 2 to this Code of Conduct: Bullying, Harassment and Anti-Discrimination Policy for further information.

4.3 Confidential Information

Confidential information gained during the course of employment must not be released to other persons, including persons who could materially affect the position of the Employer's interests.

4.4 Privacy

The Employer is committed to protecting the privacy of employees' personal information in accordance with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (APPs). It applies to all employees, contractors, and other personnel engaged by the organisation.

a. Collection of Personal Information

The organisation will only collect personal information that is reasonably necessary for its business functions and activities, and as permitted by law, including but not limited to collection of personal information collected through the Employer's Site App during the induction process. Personal information may include, but is not limited to, the employee's name, contact details, qualifications, employment history, health information, and emergency contact details.

This information is collected to verify your credentials and ensure compliance with workplace safety and operational requirements.

b. Use and Disclosure of Personal Information

Personal information will only be used for the purposes for which it was collected or as required by law. The organisation will not disclose personal information to third parties without the employee's consent, except where required or authorised by law or where necessary to prevent a threat to health and safety.

c. Security of Personal Information

The organisation is committed to taking reasonable steps to protect personal information from misuse, interference, loss, and unauthorised access or disclosure. This includes implementing appropriate physical, technical, and administrative safeguards.

Employee data is securely stored on Australian-based servers via Google Cloud Services. All information is password protected, and the Employer have implemented strong security measures to ensure your personal data is protected from unauthorised access

d. Retention and Disposal

The organisation will retain personal information only for as long as it is required for the purposes for which it was collected or as required by law. Personal information that is no longer needed will be securely destroyed or de-identified.

If you wish to delete your personal information, you can submit a request to Harold Jensen at harold.jensen@beenleighsteel.com.au , and we will take appropriate action to remove your data.

e. Complaints

Employees who believe their privacy has been breached may lodge a complaint with management. Complaints will be handled in accordance with the organisation's grievance procedures and the requirements of the *Privacy Act 1988* (Cth).

f. Employee Obligations

Employees must ensure that any personal information they handle in the course of their duties is treated confidentially and in accordance with this policy. Employees must not disclose personal information to unauthorised persons or use it for unauthorised purposes.

g. Employee Rights

In compliance with the *Privacy Act 1988* (Cth), employees have the right to access and update the personal information the Employer holds about the employee. Employees seeking to access or amend their data can contact the office on ph. 07 3440 1500.

4.5 Attendance

An employee must attend work during required hours unless:

- the employee (or a member of the employee's immediate family or household) is affected by a medical or other serious emergency, including family and domestic violence, beyond the employee's control; or
- the employee has approval from the Employer to be absent from work or is on some form of approved leave.

All employees are required to start work on time, to observe the proper times for breaks and to work until the scheduled end of their workday. Where it is deemed appropriate by the Company, employees will be required to comply with procedures regarding time recording.

Employees not able to attend work for any reason must make reasonable efforts to advise their manager before their starting time on each day of absence. The manager must be advised of the reasons for the absence and the expected date of return. Absences due to personal or carer's leave may require presentation of a medical certificate of other acceptable evidence.

Excessive absenteeism, unauthorised absenteeism and/or a failure to provide the appropriate evidence to satisfy the Employer concerning the legitimacy of the leave taken may result in disciplinary action being taken against the employee, which may include written warnings or termination of employment, as decided by the Employer.

Refer to the Leave Policy for further information.

4.6 Performance of Duties

Employees must carry out reasonable and lawful directions and instructions given by a person authorised however, no employee shall be required to do anything which might endanger themselves or any other person.

Employees must apply themselves diligently to their work during working hours and must not undertake other activities without the prior approval of their direct manager.

Employees must not deliberately or carelessly do anything that will result in poor quality output, breach the Employer's policies, procedures and service standards, or which may bring the Company into disrepute.

4.7 Alcohol and Prohibited Drugs

No alcohol is to be consumed on the Employer premises or the Employer client premises without the express approval of the General Manager or Director. No prohibited drugs are to be bought into the Company's premises or consumed during working hours. Alcohol and prohibited drugs may not be consumed during travel to or from work.

Employees on prescription drugs which may impair their personal safety, coordination or judgment, or the safety of other persons, must report the matter to their direct manager before performing any work, in order to allow an appropriate evaluation to be made.

Any employee who is suspected of having consumed alcohol or prohibited drugs and who, in the opinion of the manager, is not capable of satisfactorily performing normal duties will be suspended, which may be with or without pay, pending further investigation and possible disciplinary action.

Refer to Schedule 1 to this Code of Conduct: Alcohol and Drug Policy for further information.

4.8 Property

Unauthorised removal or unauthorised possession of the Employer property or the property of other employees or persons (including clients) is strictly prohibited. Willful damage of property is not permitted.

A direct manager of an employee shall be entitled, without warning, to inspect an employee's locker, desk or bags but this shall only be carried out in the presence of the employee concerned, and in the presence of a witness.

All serious cases, particularly those related to unauthorised possession of property, will be referred to the police. Any disciplinary action the Company may take is quite separate from, and in addition to, any action the police choose to take.

4.9 Company Vehicles

An employee shall be authorised to drive a Company motor vehicle only if they are in possession of a current valid driver's license for the appropriate class of vehicle and if there are no restrictions on their license.

Subject to the above, an employee may use a Company vehicle for work related purposes provided the Director has given prior permission.

The Employer is not responsible for any traffic violations whilst the vehicle is in the employee's care. Unauthorised or irresponsible use of the Company's vehicles is strictly prohibited.

An employee may have their employment terminated in the event of a conviction of a driving offence resulting in loss of license if they are unable to reasonably perform their work duties due to their loss of license.

Refer to the Use of Company Vehicles & Plant Policy for further information.

4.10 Internet, Social Media, Email and Computers

Employees must familiarise themselves with the Company's Internet, Social Media and Email Use Policy and note that the Company reserves the right to audit and review any email and data files on its system at any time.

Refer to the Internet, Social Media and Email Use Policy for further information.

4.11 Safety Procedures

Employees and contractors are required to work safely, take responsibility for their own health, safety and wellbeing, and observe all workplace health and safety procedures at all times.

Refer to Schedule 3 to this Code of Conduct: Workplace Health and Safety Policy for further information.

4.12 Public Statements

Public statements, whether written or verbal, relating to the business of the Employer are prohibited without the express approval of the General Manager or Director.

4.13 Smoke-Free Workplace

By law all workplaces must be smoke-free. All employees and contractors must observe this requirement. Any rules relating to outdoor smoking areas, or areas near entrances or exits to buildings where smoking is prohibited will be communicated to employees and contractors.

Refer to the Smoke Free Workplace Policy for further information.

Schedule 1: Drug and Alcohol Policy		
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Policy context:	
Related Policies	Code of Conduct Unsatisfactory Performance, Misconduct, Discipline and Termination Policy
Legislation or Other Requirements	<i>Work Health and Safety Act 2011 (Qld)</i> <i>Work Health and Safety Regulation 2011 (Qld)</i> <i>Fair Work Act 2009 (Cth)</i> <i>Criminal Code Act 1899 (Qld)</i>

1. Purpose

Beenleigh Steel Fabrications Pty Ltd, BSF Mobile Cranes Pty Ltd and BSF Design Solutions Pty Ltd (the Employer) is committed to providing a safe, healthy, and productive working environment for all employees, contractors, and visitors in accordance with its obligations under the *Work Health and Safety Act 2011 (Qld)*.

This Policy aims to:

- Establish clear standards regarding alcohol and drug use
- Protect the health and safety of all workers and other persons in the workplace within a high-risk industry
- Ensure compliance with relevant legislation and industry standards, including the *Workplace Health and Safety Act 2011 (Qld)* and the *Workplace Health and Safety Regulation 2011 (Qld)*
- To eliminate and control risks which may lead to impairment affecting health and safety in the workplace
- Support employees who may be experiencing substance dependency issues.

The presence of any detectable or observable amount of alcohol or other drug in an employee is prohibited, and any infraction of these rules will result in disciplinary action, which may include the termination of employment or contractor agreement.

The Employer is committed to providing an alcohol and drug free environment for all employees and contractors when undertaking their work at all locations. Accordingly, all employees acknowledge that no alcohol is to be consumed or drugs used by employees during their working hours, including meal breaks. The employee is also not to attend work, drive a motor vehicle or operate heavy machinery while intoxicated from alcohol or drugs.

2. Scope

This Policy forms part of the Code of Conduct and applies to all employees, contractors, subcontractors and any other individuals engaged in work for the Company, regardless of their employment status or location of work on or off-site.

3. Definitions

Alcohol means any beverage containing ethyl alcohol.

Drug means any chemical substance, whether legal prescription and non-prescription drug or illegal drug, which affects and/or impairs the physical or mental functions of a person.

Drug and alcohol test means testing for, but not limited to, alcohol, opiates, tetrahydrocannabinol (THC), cocaine, heroin, benzodiazepines, amphetamines, methamphetamines, ecstasy, prescription and non-prescription drugs which may affect the mental alertness and coordination of a person.

EAP means Employee Assistance Program.

Fitness for Work Assessment is an independent medical evaluation conducted by qualified occupational health professionals to determine an employee's physical and mental capacity to carry out their job duties safely and effectively without risk to themselves or others.

Illegal drug means any chemical substance that affects the physical or mental functions of a person, and it is a criminal offence for a person to take, possess, distribute or sell, which includes, but is not limited to, substances such as cannabis, methamphetamines, ecstasy, heroin and cocaine.

Medication Management Plan (MMP) is a structured, individualised approach designed to ensure the safe, effective, and appropriate use of medications of an employee in the workplace.

Non-prescription drug means a Pharmacist Only Drug or Pharmacy Only Drug which is a legal drug that is not required to be prescribed by a medical practitioner to treat a medical condition or illness but may affect and/or impair the physical or mental functions of a person (e.g. allergy medication, cough syrup).

Prescription drug means a drug that an employee is legally prescribed and authorised by a medical or other legitimate health practitioner to take to treat a medical condition or illness but may affect and/or impair the physical or mental functions of a person (e.g. pain killers, certain anti-depressants which cause drowsiness).

Reasonable Suspicion means a belief based on objective and observable indications that an employee is under the influence of alcohol or drugs.

Safety-Critical Role means any position where impairment could create significant risks to health and safety.

WHS means Work Health and Safety.

Worker has the meaning given under s 7(1) of the Work Health and Safety Act 2011 (Qld), including employees, contractors, subcontractors, labour-hires, apprentices, trainees, volunteers, and outworkers of the Employer (if any).

4. Drug and Alcohol Policy

4.1 Alcohol

- a. Reporting to work or working under the influence of alcohol is prohibited. Unauthorised consumption of alcohol during working hours or on the Employer premises or worksites is prohibited.
- b. While it is a personal decision to lawfully use alcohol, it is essential that such use does not interfere with the official and safe performance of the individual's duties, or reduce the employee's or contractor's dependability, or reflect on the worker or the Employer.
- c. Moderate alcohol consumption may be permitted at authorised corporate events or when the express written approval of the General Manager or Director has been obtained prior to an event. Where alcohol is consumed at a work or work-related events, responsible service of alcohol principles applies and employees and workers must arrange alternative transport if needed.

4.2 Illegal Drugs

- a. The manufacture, distribution, possession, disposition, sale, purchase of or use of illegal drugs by the Employer employees during working hours is prohibited.
- b. An employee or worker will not report to work, or perform work, while under the influence of any illegal drug.
- c. An employee will not report to work, or perform work, if judgment, coordination, or performance could reasonably become impaired during work due to the use of an illegal drug or substance.
- d. The employee or worker must not have any active or inactive metabolites of an illegal drug in their system.

4.3 Prescription and Non-prescription Drugs

- a. An employee may not report to work, or perform work, if judgment, coordination, or performance could reasonably become impaired during work due to the use of a legal prescription or non-prescription drug.
- b. An employee whose judgment, coordination, or performance could reasonably become impaired during work due to the use of a legal prescription or non-prescription drug must report to their manager that they are taking the prescription or non-prescription drug. The manager will escalate this matter to the General Manager or Director if it is deemed by the manager that a proper assessment of whether the employee can continue to work safely is warranted.
- c. If an employee or worker needs to take a drug or medication for an illness or injury, and that drug or medication may affect their mental alertness and/or coordination, they must have a Medication Management Plan (MMP) in place to ensure the safe, effective, and appropriate use of the drug or medication in the workplace. An MMP is a collaboration between the employee or worker, healthcare providers, and Employer and includes a detailed list of all medications, dosages and administration instructions, risk assessments for potential interactions or adverse reactions, and clear action plans for managing changes in health status or medication regimens.

5. Drug and Alcohol Testing

5.1 Reasonable suspicion of alcohol or illegal drug use

- a. Where there is reasonable suspicion that an employee is under the influence of alcohol or drugs during working hours, the employee must cease work immediately or will be directed to cease work immediately. The employee may be suspended, with or without pay, pending further enquiry, a workplace investigation process and/or drug and alcohol testing.
- b. Reasonable suspicion must be based on a reasonable and clearly definable belief that the employee is under the influence of alcohol or drugs on the basis of specified, contemporary physical, behavioural, or performance indications of probable alcohol or drug use.

5.2 Other times when drug and alcohol testing may be required

The Employer may also reasonably direct and require its employees and workers to undergo drug and alcohol testing in the following situations:

- a. Pre-employment testing for safety-critical roles
- b. Random testing program
- c. Post-incident testing
- d. Fitness for work assessment when returning to work (see clause 5 of Schedule 3 to the Code of Conduct: Workplace Health and Safety Policy for further information regarding fitness for work assessments).

5.3 Drug and alcohol testing methods

- a. Alcohol testing is only to be undertaken by use of an Accredited Breath Test device. The device must be calibrated and meet the minimum requirements of AS3547:2019.
- b. Drug testing may be performed by oral fluid or urine testing. The equipment used to perform the test shall be operated, tested and calibrated to the manufacturer's instructions and certified to AS 4760:2019 for saliva testing and AS/NZS 4308:2023 for urine testing.
- c. Drug testing shall be conducted by an accredited person and follow chain of custody provisions required by AS 4760:2019 for saliva testing and/or AS/NZS 4308:2023 for urine testing.
- d. All non-negative results from breath, saliva and/or urine tests are to be confirmed through laboratory-based testing methods by a qualified person, which may include gas chromatography–mass spectrometry (GC–MS) or liquid chromatography–mass spectrometry (LC-MS). The confirmation testing of a non-negative result must comply with AS/NZS 4308:2023 standard for urine drug testing, AS3547:2019 for alcohol breath testing and/or AS/NZS 4760:2019 standard for saliva testing, as relevant

5.4 Drug and alcohol testing process

To ensure workplace safety, the Employer is able to require and direct an employee to participate in drug and/or alcohol testing on the basis of reasonable suspicion of drug or alcohol use (as per clause 5.1 above) or under other reasonable circumstances (as per clause 5.2 above) and will:

- a. Provide the employee or worker with written notice of the drug and/or alcohol testing requirement and direction;
- b. Obtain written consent from the employee or worker to conduct the drug and/or alcohol test. If the employee or worker fails to provide consent and refuses to undergo the drug and/or alcohol test, this may be considered a failure of the employee to follow a lawful and reasonable direction of the Employer and will be regarded by the Employer to be a non-negative test result for drug and/or alcohol use by the employee. After this, the Employer will follow the workplace investigation and discipline processes provided in clause 5.6.c below.
- c. If the employee or worker is taking a Prescribed Drug or Pharmacy Only Drug that they believe could register a positive test result, they should inform the authorised testing agent, designated collector or their Employer prior to undergoing the requested test/s. If a Prescribed Drug or Pharmacy Only Drug is detected through drug testing without the employee or worker having first disclosed that they are taking the drug to either their Employer or the authorised testing agent, they may be liable to discipline as appropriate, which may include termination of employment.
- d. Conduct the drug and/or alcohol test in accordance with clause 5.3 above.
- e. Ensure a confirmatory drug and/or alcohol test is conducted by a qualified person in accordance with AS3547:2019 for alcohol breath testing, AS/NZS 4308:2023 standard for urine drug testing and AS/NZS 4760:2019 standard for saliva testing as per clause 5.3.d above.
- f. Ensure confidential management of all drug and/or alcohol test results in accordance with the *Privacy Act 2008* (Cth).

5.5 Drug and alcohol testing results

TPG requires the following drug and/or alcohol testing results from its employees and workers:

- a. Zero blood alcohol concentration.
- b. a negative test for active metabolites of drugs.
- c. a negative test for non-active metabolites of drugs, that is, substances that remain in the body after the drug's immediate effects may have worn off.
- d. a result that is less than the target level or is consistent with a level expected from therapeutic use of a Prescribed Drug or Pharmacy Only Drug, which was advised by the employee or worker prior to testing in accordance with clause 5.4.c above, will be considered a negative result.

5.6 What happens after the drug and/or alcohol test provides a result?

- a. If the employee's test result is negative for drugs and/or alcohol, then the employee will be informed and directed to perform their work duties as usual.
- b. If the employee's test result is non-negative for drugs and/or alcohol, they will be requested to undergo a further drug and/or alcohol test (as relevant), which is to be conducted by a qualified person, to confirm whether they do have alcohol, drug or drug metabolites in their system. The employee or worker will be stood down from work while this confirmatory test is being undertaken and until the results of a negative test are provided.
- c. If the confirmatory test reveals a further non-negative result of alcohol, drugs or drug metabolites, or the employee refuses to provide consent to undertake the drug and/or alcohol test, then the employee will be informed of the test result (where relevant) and that they are suspended from their employment while a workplace investigation is undertaken in accordance with the Employer's Unsatisfactory Performance, Misconduct, Discipline and Termination Policy. The employee will be put on notice that the outcome to the workplace investigation could result in discipline due to breaching this Policy and/or failing to follow a lawful and reasonable direction of the Employer, which may include termination of their employment.
- d. Where an employee or worker is excluded from the workplace as a result of a non negative test result for drugs and the confirmatory test is positive for a Pharmacy Only or Prescription Drug, the following factors would normally be considered in deciding when it is appropriate to allow a worker to return to the workplace and/or return to normal duties:
 - (i) Whether the worker declared the medication during the pre-test interview with the authorised testing agent, designated collector or has informed their Employer;
 - (ii) Whether the level of the medication detected is consistent with therapeutic use;
 - (iii) Written advice from the employee's or worker's doctor advising that the medication is required to treat a medical condition; and
 - (iv) That the medication will not affect the worker's ability to perform the inherent requirements of their job, which may require the Employer to direct the employee to undertake a fitness for work assessment in accordance with clause 5 of Schedule 3 to the Code of Conduct: Workplace Health and Safety Policy.

6. Employee assistance

- a. The Employer recognises that drug and alcohol abuse can be successfully treated and is committed to helping employees who suffer from these problems, while holding them responsible for their own recovery.
- b. The Employer may also require the employee to undertake counselling or rehabilitation before return to work is scheduled.
- c. The intent of this policy is to offer a helping hand to those who need it. The Employer will provide any necessary information to employees who suffer from such abuse, and referral to an appropriate treatment provider if treatment is required.

- d. Personal or other leave may be made available for any incidental time required off work.
- e. Arrangements to take appropriate leave will be made with the employee for any extended periods of time off work, based on the advice of a treatment provider and accompanied by a medical certificate.
- f. Any information regarding an employee's condition will be treated in the strictest confidence and in accordance with the *Privacy Act 1998* (Cth). No referrals will be made or information provided to other parties without the permission of the employee involved.

7. Further information

If you require further information, please speak with your manager.

Schedule 2: Bullying, Harassment and Anti-Discrimination Policy		
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Policy Context:	
Related Policies and Documents	Code of Conduct Employee Complaints, Disputes and Grievances Unsatisfactory Performance, Misconduct, Discipline and Termination Policy
Legislation or Other Requirements	<i>Anti-Discrimination Act 1991 (Qld)</i> <i>Human Rights Act 2019 (Qld)</i> <i>Age Discrimination Act 2004 (Cth)</i> <i>Australian Human Rights Commission Act 1986 (Cth)</i> <i>Disability Discrimination Act 1992 (Cth)</i> <i>Racial Discrimination Act 1975 (Cth)</i> <i>Sex Discrimination Act 1984 (Cth)</i>

1 Purpose

This Policy records the commitment of Beenleigh Steel Fabrications Pty Ltd, BSF Mobile Cranes Pty Ltd and BSF Design Solutions Pty Ltd (the Employer) to provide a workplace which is free from bullying, harassment or any other form of abuse including sexual, racial or physical harassment. The Policy also sets out the obligations on managers to ensure all employees know that bullying and harassment is unacceptable and that the workplace is free from items or materials that in the context of general community standards may be considered offensive by other people.

Bullying and harassment in the workplace generally occurs when a person is subjected to conduct which is unwelcome or offensive and is serious or persistent to the extent that it has a detrimental effect on the employee's employment, job performance, job satisfaction, or job opportunities.

2 Scope

This Policy forms part of the Code of Conduct and applies to all employees, contractors, subcontractors and any other individuals engaged in work for the Company, regardless of their employment status or location of work.

3. Policy

The Employer is committed to ensuring every employee enjoys a working environment free from bullying harassment. The Employer has established expectations relating to business and personal behaviour which are expected to be followed by all employees, contractors and its clients. Bullying and harassment will be considered a form of serious misconduct and will not be tolerated.

Bullying, harassment and discrimination is proscribed by both legislation and by the Employer's Policy – Code of Conduct.

As part of its commitment against workplace bullying and harassment, the Employer has a robust and effective procedure for dealing with such complaints and ensures:

- The Director is responsible for ensuring everyone in the workplace is aware that bullying and harassment is unacceptable and free from any materials or items that may be considered offensive.
- Managers and supervisors are responsible for promoting a culture free from bullying and harassment, ensuring compliance with this policy, and addressing complaints promptly, confidentially, and impartially.
- Employees and contractors must treat others with respect and dignity, comply with this policy, and report any behaviour that breaches this policy.

4 Guidelines

Workplace bullying occurs when an individual or group of individuals repeatedly behaves unreasonably towards a worker or a group of workers, and that behaviour creates a risk to health and safety. Importantly, this definition excludes reasonable management action carried out in a reasonable manner.

Harassment is any unwelcome or uninvited behaviour that causes offence, intimidation, or humiliation, including sexual harassment, racial harassment, or other forms of harassment. Harassment can occur during work hours, outside work hours, or in connection with work-related activities.

Sexual Harassment is any unwelcome conduct of a sexual nature that a reasonable person would anticipate to be offensive, humiliating, or intimidating. This includes physical, verbal, or visual conduct.

Discrimination occurs when a person is treated less favourably than another person as a result of that person's individual characteristics, or because that person belongs to a particular group. Discrimination can be either direct or indirect.

Discrimination on the basis of the following characteristics is unlawful:

- race (including colour, nationality, religion, ethnic or ethno-religious origin);
- sex (including marital status, pregnancy or potential pregnancy, breastfeeding);
- sexuality (including sexual preference, transgender status or homosexuality);
- disability (including physical, psychiatric or intellectual disabilities);
- age;
- illness or injury;
- parental status or responsibilities as a carer; or
- membership or non-membership of a union.

No employee or contractor is permitted to engage in bullying, harassment or discriminatory conduct in relation to treatment of other employees or contractors (including members of the public).

The following are a non-exhaustive list of strictly prohibited behaviours in the workplace or related to the workplace by one person or group of persons against another person or group of persons:

- Verbal abuse or insults
- Bullying, including exclusion, assigning unreasonable tasks, or spreading rumours

- Physical harassment, including uninvited physical contact or intentional touching, patting or pinching
- Discrimination based on sex, race, age, disability, or other protected attributes
- Hostility against, or bringing into contempt or ridicule, an employee or other person on the grounds of religion, sex, race, colour, ethnic or national origins or any other ground specifically proscribed by state or federal law
- Using language or visual material of a sexual, sexist, homophobic or racist nature
- Sexual harassment, including lewd comments, inappropriate touching, or unwelcome advances.

5. Procedure

Bullying and harassment complaints may be made by an employee or representative of the employee, a contractor or client. In all cases it is unacceptable and will not be tolerated.

If an employee, contractor or sub-contractor feels they are being bullied or harassed, they should immediately approach their direct manager to discuss the situation. If the employee feels the manager is directly involved, or their manager is bullying or harassing them, then the General Manager or Director should be approached and the same procedure followed.

The Director or manager should provide advice to the employee or contractor and ascertain what specific steps the individual wishes to be taken.

5.1 Making the Complaint

An employee or contractor who has experienced bullying and harassment of any description is entitled to make a complaint. A person who makes a formal complaint must not be victimised, treated differently, or suffer retaliation for the mere fact of making the complaint as this is unlawful.

A formal complaint must be documented (e.g. made in writing) detailing the facts (that is, *Who* the matter involves, *What* occurred, *When* it occurred as to dates and times and *Where* it occurred), and given to the General Manager or Director. Once a formal complaint has been received in writing, the employee or contractor who has made the complaint regarding bullying and harassment will receive a response on the process of investigation or its outcome within seven working days regarding the outcome of any formal investigation (if known at that time).

5.2 Workplace Investigation

A workplace investigation will commence once a formal complaint has been received. The General Manager or Director will either conduct the investigation or advise who the investigator will be; who this person is may vary depending on the nature of the complaint. The investigation may include:

- Obtaining details of the allegations claimed;
- Talking to witnesses;
- Talking to the person against whom the allegations are made and providing them with details of the allegations (how this is handled may vary depending on the nature of the allegations);
- Checking employment records.

It is expected that throughout the grievance process, staff will perform their usual duties in the normal way. If the nature of the grievance means that this cannot occur then the Director will discuss any issues with the employee and appropriate changes may be made.

During the course of an investigation, the Employer has the authority to suspend, on full pay or without pay, the employee the subject of the investigation for the purpose of ensuring that it is properly conducted and to ensure employee safety, if relevant.

5.3 Outcome of Workplace Investigation

Following the workplace investigation, the investigator will present the findings to the appropriate Company officer – usually the Director (except where the Director is the person involved directly in the complaint, dispute or grievance, then an appropriate manager will be nominated as the appropriate officer).

No decision will be made prior to the finalisation of the investigation. The appropriate Company officer will, on the basis of evidence and the report, determine whether the alleged conduct occurred and what action should be taken.

If the complaint is substantiated, the appropriate officer will:

- Ensure that steps are put in place to remove the offending behaviour or workplace process;
- Provide feedback to parties and also to witnesses (where appropriate);
- Implement an immediate action plan and follow-up action at a later date;
- Take appropriate action, which may include the Company taking disciplinary action (including formal counselling, a formal warning or termination of employment) against the employee whose conduct is found to be in breach of Company policies.

If the complaint is not substantiated, The Company officer will:

- Provide feedback to parties and also to witnesses (where appropriate);
- Protect the reputation of the person against whom the allegations have been made;
- Explain the outcome of the investigation to affected parties. The reasons for the findings will be explained to the employee making the complaint and the staff member against whom the allegations were made; and
- Implement appropriate follow-up action at a later date that will be communicated to the employee making the complaint.

5.4 Confidentiality

Investigations will only be discussed with relevant employees or any other person as necessary for the resolution of the grievance. The involvement of other people (e.g. witnesses) should be kept to a minimum to maintain confidentiality, but sufficient to establish firsthand factual evidence where possible. All individuals who participate in a workplace investigation are involved on a “need to know” basis.

All parties may be requested to sign a confidentiality agreement. Whether such a confidentiality agreement is signed or not, the Company takes the confidentiality of a workplace investigation extremely seriously and any breach of confidentiality in this respect will be treated as a breach of this policy and may result in disciplinary action which may

include a Written Warning or even termination of employment. The Employer has no tolerance for breaches of confidentiality in relation to workplace investigations.

5.5 Support Person

At any stage of the grievance procedure, an employee may utilise the assistance of an appropriate support person. Such a person may be a work colleague, a friend, family member or union officer. When a person acts in the capacity of a support person, they are not there to be an active part of the investigation. They are there purely to provide 'moral support' to the staff member in pursuing the grievance process and have no influencing or implementation power.

It may be at times that a nominated support person is inappropriate and in such circumstances the employee may be asked to choose another support person. A support person is required to maintain confidentiality at all times during and after any investigation.

5.6 Employee and Contractor Responsibilities - Vexatious and False Complaints

It is a breach of this Policy and the Code of Conduct for a person to make a vexatious or false complaint (e.g. a maliciously exaggerated allegation). Once this has been proven or established, the person making the claim may be subject to disciplinary action on the basis of misconduct or serious misconduct.

All employees should be aware that they are directly responsible and legally liable for their own decisions, actions and behaviours in the workplace. A person against whom a vexatious or false complaint is made also has the right to seek redress if they so choose outside the confines of their employment with the Employer.

Failure to comply with the Employer's policies and procedures, in particular the Code of Conduct, may lead to disciplinary action including termination of employment.

Schedule 3: Workplace Health and Safety Policy		
Version #: 1	Authorised by: AS	Original Issue: Nov 2025
Last Review Date: Nov 2025	Reviewed by: OA	Next Review Date: Nov 2026

Policy Context:	
Related Policies and Documents	Code of Conduct
Legislation or Other Requirements	<i>Work Health and Safety Act 2011 (Qld)</i> <i>Work Health and Safety Regulation 2011 (Qld)</i>

1 Purpose

This Policy sets out guidelines for promoting Beenleigh Steel Fabrications Pty Ltd's and BSF Mobile Cranes Pty Ltd's (the Employer's) employee health, safety and welfare while encouraging continuous improvement and outlining procedures concerning accidents, workplace representatives and workplace committees.

2 Scope

This Policy forms part of the Code of Conduct and applies to all employees, contractors, subcontractors and any other individuals engaged in work for the Company, regardless of their employment status or location of work.

3 Definitions

Consultation Mechanism: The formal process through which the Company engages with workers and their representatives regarding work health and safety matters, including health and safety representatives (HSRs), unions, and other worker representatives.

Fitness for Work Assessment is an independent medical evaluation conducted by qualified occupational health professionals to determine an employee's physical and mental capacity to carry out their job duties safely and effectively without risk to themselves or others.

Hazard: Any situation, substance, structure, system or thing that has the potential to cause harm to health and safety.

Mental Health Risk: Any workplace factor that may cause, contribute to, or exacerbate mental health conditions.

Notifiable Incident: An incident as defined under the applicable WHS Laws that must be reported to the relevant regulator.

Reasonably Practicable: As defined in Section 18 of the *Work Health and Safety Act 2011* (Qld), means reasonably able to be done taking into account:

- likelihood of the hazard or risk occurring;
- degree of harm that might result;
- what the person concerned knows about the hazard or risk and ways of eliminating or minimising it;
- availability and suitability of ways to eliminate or minimise the risk; and

- cost of eliminating or minimising the risk.

Remote Work: Work performed at a location other than the Company's premises, including work from home arrangements.

WHS Laws: Means:

- the *Work Health and Safety Act 2011 (Qld)* and *Work Health and Safety Regulations 2011 (Qld)*
- corresponding work health and safety and occupational health and safety laws in other Australian states and territories if work is performed interstate outside of Queensland; and
- any associated regulations, codes of practice, and guidelines made under these laws.

Worker: Has the meaning given under s 7(1) of the *Work Health and Safety Act 2011 (Qld)*, including employees, contractors, subcontractors, labor-hires, apprentices, trainees, volunteers, and outworkers of the Employer.

3 Policy

The Employer is committed to ensuring the health and safety of employees, contractors as well as the safety of visitors and clients.

Each individual is required to take a responsible and active interest in maintaining a healthy and safe workplace. In addition to complying with formal policies and procedures, this includes a demonstrated understanding of the need to 'think ahead, do it right and do it now' with regards to all aspects of good health and safety management.

It is the policy of the Employer that no job is so urgent or important that it requires an employee to take unacceptable risks. If there is any doubt as to health and safety, all employees and contractors are to err on the side of caution so that all necessary safeguards are fully adhered to, without exception.

4 Procedure

4.1 Employer Responsibilities for Safety of Workers

The Employer will:

- Ensure, as far as is reasonably practicable, the health and safety of workers engaged or influenced by our business operations, as well as other persons who may be affected by our work;
- Provide and maintain a safe work environment, safe systems of work, and safe use, handling, and storage of plant, structures, and substances;
- Ensure that all workers are provided with adequate facilities, training, instruction, and supervision to perform their duties safely;
- Monitor the health of workers and workplace conditions to prevent illness or injury;
- Consult with workers and their representatives, if any, on WHS matters to ensure effective communication and collaboration in identifying and managing risks;

4.2 Employer Responsibilities for Safety of Persons other than Workers

The Employer is also responsible for the safety of the organisation's clients and visitors in the course of providing its services. Employees must ensure that, in the event of an emergency on the Company's premises or client site, client and visitor safety is guarded through pre-arranged emergency procedures which staff have been trained to implement.

Staff will ensure that access to and from the workplace, and substances used at the workplace, do not pose a health or safety risk to persons not employed by the Company but who are nevertheless working at the workplace of the Company.

4.3 Responsibilities of Supervisors

Supervisors must:

- a. implement WHS procedures in their areas;
- b. ensure Workers understand safety requirements;
- c. monitor compliance with safe work practices;
- d. investigate reported hazards and incidents;
- e. implement corrective actions; and
- f. promote positive safety culture.

4.4 Responsibilities of Workers

Workers must:

- a. take reasonable care for their own health and safety;
- b. take reasonable care not to adversely affect others' health and safety;
- c. comply with reasonable instructions and policies;
- d. cooperate with WHS initiatives;
- e. wear PPE as instructed;
- f. report hazards and incidents promptly; and
- g. participate in relevant training and consultation.

A failure of workers to comply with these responsibilities will lead to disciplinary action being taken, which may include termination of the employee's employment or termination of the contractor's agreement.

4.5 Risk Management

The Employer adopts a systematic approach to risk management by:

- a. hazard identification through:
- b. workplace inspections;

- c. task analysis;
- d. incident investigations; and
- e. worker consultation;
- f. risk assessment considering:
 - i. likelihood of occurrence;
 - ii. potential consequences;
 - iii. existing controls; and
 - iv. additional control options;
 - I. risk control implementing the hierarchy of controls;
 - II. monitoring and review of control effectiveness; and
 - III. documentation of risk management activities.

4.6 Consultation

- a. The Employer will consult with Workers and their representatives through:
 - i. health and safety committees;
 - ii. elected health and safety representatives;
 - iii. union representatives where applicable;
 - iv. toolbox talks and safety meetings;
 - v. formal feedback mechanisms; and
 - vi. direct consultation on specific issues.
- b. Consultation will occur:
 - i. when identifying or assessing risks;
 - ii. when making decisions about control measures;
 - iii. when proposing changes affecting WHS;
 - iv. when developing safety procedures; and
 - v. as otherwise required by WHS Laws.

4.7 Record of Injuries

The *Workplace Health and Safety Act 2011* (Qld) requires that a record of particulars of Notifiable Incidents involving every work injury, work-related illness, dangerous event or near miss that occurs in the workplace be documented within three days of the event.

Workers should be aware of this requirement and ensure that an Incident Report Form is completed in the case of a Notifiable Incident including injury, illness, dangerous occurrence

or near-miss. All records must be maintained at the workplace and must be made available for inspection.

An Incident Report Register will be maintained by the safety manager and kept in a locked filing cabinet. Completed Incident Report Forms will be filed in the relevant Personnel File or in a central file where an incident relates to non-staff individual.

Forms must be kept for one year, or three years if a dangerous electrical event or serious electrical incident occurred. When this time has expired, the form may then be disposed of in an appropriate manner.

4.8 Accident Reporting

In the event of a Notifiable Incident involving serious bodily injury, work-related illness, or dangerous occurrence, employees will immediately notify the Director.

4.9 Accident Resulting in Death

Where the Notifiable Incident involves an injury, illness or dangerous event causes death, the Director must be notified immediately. Further, there must be no interference with the scene of the accident or event, unless such interference is necessary to prevent further injury to persons or damage to property.

4.10 Mental Health and Wellbeing

The Company recognises work-related mental health risks and will:

- a. identify and control psychosocial hazards;
- b. provide mental health awareness training;
- c. maintain confidential support services;
- d. accommodate flexible work arrangements where practicable; and
- e. promote work-life balance.

4.11 Remote Work Safety

For remote work arrangements, the Company will:

- a. assess home office setup and ergonomics;
- b. provide guidance on workstation setup;
- c. maintain communication protocols;
- d. address isolation risks; and
- e. ensure incident reporting mechanisms are accessible.

4.12 Emergency Management

Site-specific emergency plans will include:

- a. evacuation procedures;
- b. first aid arrangements;
- c. fire response protocols;
- d. chemical spill procedures;
- e. infectious disease protocols; and
- f. emergency contact information.

4.13 Infectious Disease Management

The Employer will:

- a. maintain infection control procedures;
- b. implement appropriate hygiene measures;
- c. provide personal protective equipment as required;
- d. support vaccination programs where appropriate; and
- e. follow public health directives.

4.14 Smoking

The Employer recognises the dangers of passive smoking and has made the office and work sites a smoke-free environment.

5. Fitness for work assessment

5.1 What is a fitness for work assessment?

A workplace fitness for work assessment evaluates an employee's physical and mental capacity to safely and effectively perform their job duties without risking their own or others' health and safety. The assessment is conducted by an occupational health professional, such as a GP, occupational physician, or specialist, and involves a comprehensive review of the employee's medical history, current health status, and the specific demands of their role. The assessment aims to identify any health conditions, limitations, or risks that could affect work performance or safety, and to recommend reasonable adjustments or accommodations if needed.

5.2 When can the Employer direct an employee or worker to undertake a fitness for work assessment?

Due to the high-risk nature of the work conducted by the Employer employees, and the Employer' legal obligations to ensure the health and safety of employees and workers, the Employer may lawfully and reasonably direct an employee or worker to undertake a fitness for work assessment under the following circumstances:

- a. when the employee or worker is returning to work following a lengthy or serious illness or injury, after a workplace injury or illness, as part of a return-to-work process, or when required under workers' compensation regulations;

- b. when there is a perceived or identified requirement of the employee or worker related to their physical health or psychiatric issues which are affecting job performance;
- c. when there is a reasonable suspicion that an employee's or worker's health may pose a risk to themselves or others in the workplace.

5.3 What is the process of a fitness for work assessment?

- a. The Employer may direct an employee to undergo a fitness for work assessment where:
 - (i) There are genuine concerns about the employee's ability to perform their role safely;
 - (ii) The direction is lawful and reasonable;
 - (iii) The assessment relates to the inherent requirements of the employee's position.
- b. The Employer will provide written notice to the employee:
 - (i) Stating the reasons for requiring the assessment;
 - (ii) Specifying the type of assessment required;
 - (iii) Nominating an appropriate medical practitioner or specialist;
 - (iv) Stating that a failure by the employee to comply with these requirements (as provided at clause 5.3.d. below) will result in disciplinary action being taken, which may include termination of the employee's employment.
- c. The fitness for work or medical assessment will be conducted by an Employer-nominated occupational health professional or medical practitioner who is independent of the Employer. The Employer will bear all reasonable costs associated with the assessment.
- d. The employee must:
 - (i) Attend the scheduled fitness for work or medical assessment;
 - (ii) Provide accurate information to the medical practitioner or occupational health professional;
 - (iii) Cooperate fully with the assessment process;
 - (iv) Consent to the release of the medical report to the Employer for the specified purpose.
- e. All medical information obtained through the assessment will:
 - (i) Be treated as strictly confidential;
 - (ii) Be used solely for the purpose of assessing fitness for work;
 - (iii) Be stored securely in accordance with the requirements of the *Privacy Act 2008* (Cth).

5.4 Outcomes of the fitness for work assessment

- a. The medical report will address:
 - (i) The employee's fitness to perform their role;
 - (ii) Any recommended workplace adjustments;
 - (iii) A return-to-work plan if applicable.
- b. After receiving the fitness for work assessment or medical report the Employer will:
 - (i) Review the medical report findings;
 - (ii) Consult with the employee regarding the outcomes;
 - (iii) Implement reasonable adjustments where practicable;
 - (iv) Maintain and confidentially store records of the assessment process.
- c. If the fitness for work assessment or medical report provides that the employee is unable to fulfill the inherent requirements of their role safely, the Employer will:
 - (i) Consult with the employee to explore alternative arrangements, such as reasonable adjustments, redeployment, or a modified role;
 - (ii) Consider any additional medical advice or evidence provided by the employee regarding their condition;
 - (iii) Where adjustments are not reasonable, the Employer will consider terminating the employee's employment in compliance with their legal and contractual obligations, including under the *Fair Work Act 2009* (Cth) and provide the employee with appropriate notice and entitlements.
 - (iv) Communicate the decision and reasoning to the employee in writing, providing an opportunity for the employee to respond.

6. Training and Information

The Employer will provide to workers:

- a. WHS induction training;
- b. job-specific safety training;
- c. emergency response training;
- d. mental health awareness training;
- e. refresher training as required; and
- f. records of all training provided.

7. Policy Implementation

This policy will be implemented through:

- a. management commitment and leadership;
- b. allocation of resources and responsibilities;
- c. development of supporting procedures;
- d. regular monitoring and review; and
- e. continuous improvement processes.

Unsatisfactory Performance, Misconduct, Discipline and Termination Policy		
Version #: 1	Authorised by: AS	Original Issue: Nov 2025
Last Review Date: Nov 2025	Reviewed by: OA	Next Review Date: Nov 2026

Policy Context:	
Related Polices and Documents	Code of Conduct Schedule 1 to Code of Conduct: Drug and Alcohol Policy Schedule 2 to Code of Conduct: Bullying, Harassment and Anti-Discrimination Policy Schedule 3 to Code of Conduct: Workplace Health and Safety Policy Employee Complaints, Disputes and Grievances Policy
Legislation or Other Requirements	<i>Fair Work Act 2009</i> (Cth) <i>Fair Work Regulations 2009</i> (Cth) <i>Work Health and Safety Act 2011</i> (Qld) <i>Work Health and Safety Regulation 2011</i> (Qld) Beenleigh Steel Fabrications Pty Ltd and CFMEU Union Collective Agreement 2023-2027 BSF Mobile Cranes Certified Agreement 2023-2027 Position Descriptions

1 Purpose

Employees of Beenleigh Steel Fabrications Pty Ltd, BSF Mobile Cranes Pty Ltd and BSF Design Solutions Pty Ltd (the Employer) may be disciplined, which may include receiving a written warning or termination of employment due to unsatisfactory performance, general misconduct or serious misconduct.

This Policy sets out the steps that are necessary for the Employer and employee to:

- undertake the management of unsatisfactory performance and/or general misconduct, including providing staff with an opportunity to improve their performance and/or conduct when not meeting the required standards.
- discipline staff for unsatisfactory performance and/or general misconduct, when performance management processes do not adequately address the concerns, of which the penalty may include termination of employment.
- discipline staff for serious misconduct, of which the penalty may include termination of employment.

This Policy does not replace the standard responsibility of a manager to discuss work performance or conduct concerns with staff members, to ensure staff are provided appropriate feedback and have a clear understanding of the work performance and conduct standards expected of them.

2 Scope

This Policy applies to all employees performing work for or on behalf of the Employer and provides further guidance in addition to the Beenleigh Steel Fabrications Pty Ltd and CFMEU Union Collective Agreement 2023-2027 and BSF Mobile Cranes Certified Agreement 2023-2027 (the EBAs).

It is to be noted that not all steps in this Policy are required to be followed, as this is a guide. In particular, not all steps are required to be followed for employees who are still under probation or that are not covered by an Enterprise Bargaining Agreement (EBA), provided the general procedural fairness and natural justice steps are applied to the specific circumstances.

This Policy is not limited to conduct that occurs in the workplace or during work hours. It extends to all conduct of employees that occurs during functions and places that are work related, including out of work conduct that may impact in any way on the Employer or the employment of an employee.

In circumstances where an employee's behaviour or conduct may involve a breach of any law, the Employer will notify the police or other relevant government authority, as required before taking any action which may lead to the termination of an employment contract.

This Policy does not cover the circumstances where a position has become redundant or the process for terminating an employee due to their position becoming redundant.

3 Definitions

'Unsatisfactory performance' means a failure or inability of the employee to meet the minimum performance standards reasonably required by the Employer.

'General misconduct' is any misconduct that is not serious misconduct.

'Serious misconduct' is defined in r 1.07 of the *Fair Work Regulations 2009* (Cth) (the Regulations) to include conduct by an employee that is wilful or deliberate and inconsistent with the continuation of the employment contract. It also encompasses actions that cause serious and imminent risk to health or safety, or to the reputation, viability, or profitability of the Employer's business. Some specific examples include theft, fraud, assault, sexual harassment, being intoxicated at work, and refusing to carry out lawful and reasonable instructions consistent with the employment contract.

4 Procedures for managing employee unsatisfactory performance or general misconduct concerns

4.1 Step 1: Workplace process for employee with unsatisfactory performance and/or general misconduct

The following process incorporates clauses 28.3, 28.4 or 41.3, 41.4 of the relevant EBA:

- a. The manager will schedule a meeting with the employee to give them an opportunity to verbally respond to their concerns. The employee will be invited to bring a support person or Union representative to the meeting.
- b. At the meeting, the manager will verbally inform the employee of the allegations related to poor performance or general misconduct, show the employee any evidence they have regarding the concerns, ask that the employee verbally respond to these allegations and ask the employee if there are any mitigating factors that may be causing or contributing to the issues of concern (e.g. the employee is suffering from health issues or stress at home or in the workplace).
- c. After the manager and employee have discussed the manager's concerns at the meeting, the Employer will make a decision whether the allegations are substantiated on the balance of probabilities (that is, whether it is more likely than not that the allegations are true and correct), based on all the evidence before the employer and the verbal responses of the employee (including any mitigating factors raised).
- d. If the allegations have been substantiated or partially substantiated, and the Employer has considered any mitigating factors raised by the employee, the Employer will then decide whether it is appropriate to issue the employee a first written warning or alternatively, to take non-disciplinary management action (such as increased performance monitoring or placing the employee on a Performance Improvement Plan).
- e. A First Written Warning issued to the employee must include:
 - i. the issues and concerns that have been substantiated by the employer; and
 - ii. the standards of improvement that the employee is required to meet in relation to performance and/or conduct must be specifically stated.

4.2 Step 2: Workplace process for employee with continuing unsatisfactory performance and/or general misconduct

The following process incorporates clauses 28.3, 28.5 or 41.3, 41.5 of the relevant EBA:

- a. If the employee fails to meet the standards of improvement required and notified in accordance with Step 1.e.ii above, or another concerning incident occurs, the Employer will take the same steps as those at Step 1 a. to d. above. In addition to the discipline and non-discipline penalties provided in Step 1.d above, the Employer may decide to issue a Final Written Warning to the employee.
- b. A Final Written Warning to the employee must include:
 - i. the issues and concerns that have been substantiated;
 - ii. the standards of improvement that the employee is required to meet in relation to performance and/or conduct must be specifically stated; and
 - iii. that it is a Final Written Warning and that failure to meet the standards of improvement required, or further incidences occur which are subject to discipline, may lead to dismissal.
- c. It is to be noted that if an employee does not repeat the same poor performance or general misconduct concerns within a 6-month period which resulted in the Final Written Warning being issued, the Final Written Warning notice becomes null and void (due to clauses 28.5 and 41.5 of the relevant EBA). If there is a repeat of the same poor performance or general misconduct after the 6-month period has expired, then a further Final Written Warning would need to be issued.

4.3 Step 3: Workplace process for employee when there is repeated unsatisfactory performance and/or general misconduct concerns

The following process incorporates clauses 28.1, 28.6 to 28.11 or 41.1, 41.6 to 41.11 of the relevant EBA if the matter involves unsatisfactory performance and/or general misconduct concerns. This is in the event the employee fails to meet the standards of improvement required by the Final Written Warning as provided in Step 2.b.ii above, or another concerning incident regarding poor performance or general misconduct occurs within 6 months of the employee being issued with a Final Written Warning.

- a. The Employer should write a letter to the employee which:
 - i. details the issues and concerns previously substantiated and issued warnings;
 - ii. details any new all allegations of poor performance or general misconduct to the employee to provide them with an opportunity to respond;
 - iii. asks the employee to show cause as to why their employment should not be terminated if it is substantiated that the employee failed to improve to the required standard;
 - iv. provides a deadline of date/time and email address for the employee to submit a written response to the new allegations, to show cause as to why their employment should not be terminated and provides an opportunity for the employee to raise any mitigating factors for the employer to consider; and
 - v. schedule a meeting date/time/location and names of roles of who will be in attendance. This is to provide the employee with an opportunity to respond verbally to the allegations and to the show cause as to why their employment should not be terminated.
- b. After the Employer and employee have discussed the employer's concerns at the meeting and considered any written responses from the employee, the employer will make a decision whether the new allegations are substantiated on the balance of probabilities (that is, whether it is more likely than not that the allegations are true and correct), based on all the evidence before the employer and the verbal responses of the employee.
- c. If the allegations of poor performance or general misconduct have been substantiated or partially substantiated, the employer will then consider the show cause responses of the employee and will determine what disciplinary action will be taken which may include termination of employment.

5. Workplace procedure for alleged employee serious misconduct

- a. The Employer should write a letter to the employee which:
 - i. provides the serious misconduct allegations to the employee in writing to provide them with an opportunity to respond;
 - ii. asks the employee to show cause as to why their employment should not be terminated in the event that the serious misconduct allegations are substantiated;
 - iii. provides a deadline of date/time and email address for the employee to submit a written response to the new allegations, to show cause as to why their employment should not be terminated and include any mitigating factors for the employer to consider; and

- iv. schedule a meeting date/time/location and names of roles of who will be in attendance. This is to provide the employee with an opportunity to respond verbally to the allegations and to the show cause as to why their employment should not be terminated, including raising any mitigating factors.
- b. After the employee's response has been received (in writing and/or in a meeting or both), the Employer will make a decision as to whether the serious misconduct allegations are substantiated on the balance of probabilities (i.e. whether it is more likely than not that the allegations are true and amount to serious misconduct) and will then make a decision on disciplinary action which in most cases will involve the termination of employment for serious misconduct.

Internet, Social Media and Email Use Policy		
Version #: 1	Authorised by: AS	Original Issue: Nov 2025
Last Review Date: Nov 2025	Reviewed by: OA	Next Review Date: Nov 2026

Policy context:	
Related Policies and Documents	Code of Conduct Schedule 2 to Code of Conduct: Bullying, Harassment and Anti-Discrimination Policy
Legislation or Other Requirements	<i>Privacy Act 1988 (Cth)</i>

1 Purpose

This Policy explains the rules regarding the use of Beenleigh Steel Fabrications Pty Ltd's and BSF Mobile Cranes Pty Ltd's (the Employer's) internet, computer and email systems as well as conduct for social media use which may be considered related to work or the workplace.

2 Scope

This Policy will apply to all employees of the Employer.

3. Policy

The Employer has internet, computer and email facilities which are permitted for business use and communication purposes only. Limited personal use is permitted, however people using the Employer 's system for personal use must recognise and accept that such use is governed by this Policy and its associated procedures.

4 Procedure for Email Use

4.1 General Principles

Employees should remember to check, file and clear emails regularly.

Employees should add correct signature blocks, contact details and privacy statements to each email sent on behalf of the Employer as directed by the Director from time to time. Appropriate language should always be applied and messages should be clear and accurate. The spell check should always be used before sending an email as poor standards of communication may negatively reflect the reputation of the Company.

Email should not be viewed as the sole method for the distribution of documents. Confidential documents should not be sent as an email attachment.

4.2 Privacy

Emails at work are not private, and any email, computer and data files may be audited by the Employer at any time and without warning. While there is no intention to "snoop", the Employer is legally responsible for all email communications and reserves the right to review all emails on an ongoing and continuous basis where necessary.

4.3 Legal Issues

Employees must be aware that emails, unlike internal telephone calls, create a permanent written record of communications and are legally “discoverable” documents. Emails containing commercially sensitive material written to clients, suppliers of services and government agencies must be approved by the General Manager or Director or communicated in line with the Employer’s service standards, policies and procedures.

Employees should never download material subject to copyright from the Internet, such as computer software.

4.4 Authorship

No employee, in any circumstances, may send an email in the name of another person without the other person’s express permission. It is a breach of the Employer’s security and privacy policies for such an attempt to be made, or for other computerised files to be accessed without permission, and disciplinary action may follow.

4.5 Personal and Trivial Use

Staff must not use email for personal or private communications if it interferes with duties and responsibilities at work. The Employer’s email, internet and computer systems are business tools intended to be used for work related purposes. The Company will discipline employees for excessive private email and social media use, including sending unsolicited junk email and notifications, advertising or copying emails to others, comments or pictures on social media that cause offense to colleagues and may disrupt the work environment (even if sent outside of work hours). Repeated private use of Internet, emails or social media at unacceptable levels may result in disciplinary action being taken against the employee.

4.6 Email Not Meant for You

Employees must not read, delete, copy or modify an email owned by other users without permission. In addition, email messages must not be forged or altered to make them look as though they are coming from another person.

4.7 Respect for Others

Employees must not send obscene, abusive, sexist, racist, or threatening emails or social media posts under any circumstances. The email system or social media platforms must also not be used in connection with work for defamatory, offensive or otherwise unwelcome communication, or any communication which is discriminatory or harasses any person.

If any of the above inappropriate conduct occurs, the employee may face disciplinary action or their employment may be terminated.

4.8 Absence from Work

Where available, “out of office” updates are encouraged to be turned on for planned absences from work. Messages should detail who may be contacted in an emergency or during an employee’s period of absence, how the alternative person can be reached (phone/email address) and when the employee will return to the the office.

With the managers permission, it may also be appropriate to re-direct emails from one person to another to ensure the smooth and timely operation of the Employer services.

5. Procedure for Social Media Use

5.1 General Principles and Definitions

Social media includes the various internet-based applications that allow the creation and exchange of user-generated content. Social media enables individuals to communicate via the internet, sharing information and resources. Sites such as Facebook are a social utility that connect people with family and friends.

Content is the information that is put onto social media sites, which includes text, audio, video, images, podcasts and other multimedia communications.

This policy covers, but is not limited to, the sites and services mentioned below, and is also intended to cover other social media services as they develop in the future. The sites and services are:

- a. social networking sites (e.g. Facebook, Instagram, Snapchat);
- b. professional networking services (e.g. LinkedIn);
- c. video and photo sharing websites (e.g. YouTube, Instagram, Flickr, TikTok);
- d. micro-blogging (e.g. X);
- e. forums and discussion boards (e.g. Google Groups);
- f. online collaborations (e.g. Wikipedia);
- g. podcasting;
- h. blogs including corporate blogs and personal blogs; and
- i. blogs hosted by traditional media outlets.

5.2 Public Comment

The Employer employees, as private citizens, can engage in public debate on political and social issues, whether on the radio, the internet, in newspapers, on the television or social media sites. However, in such circumstances, an employee should not:

- make comment as a representative of the Employer unless authorised to do so;
- identify his or herself as an employee of the Employer unless authorised to do so; or
- make comment, regardless of the connection with the employee's duties, that amounts to criticism sufficiently strong or persistent to give rise to a public perception that an employee is not prepared to implement or administer the policies of the Employer as they relate to the employee's duties.

5.3 Bullying, Harassment and Anti-Discrimination

Just as bullying and harassment will not be tolerated in the workplace, nor will it be tolerated if it occurs on a social media site. This is regardless of whether it occurs on duty or outside of work hours.

Employees are not to post any adverse or critical content about any other employee or individual on social media sites, including material which is offensive, obscene, bullying, discriminatory, hateful, racist, sexist, abusive, harassing, threatening or defamatory.

If a bullying or harassing post is made, it is likely that disciplinary action will be taken against the perpetrator (which could include dismissal). Such content may also amount to civil proceedings and give rise to the perpetrator being sued for damages, or even charged with a criminal offence. Employees may be held personally liable in relation to any ensuing litigation arising from such content being posted. The Employer reserves the right to request that

certain posts and inappropriate comments be removed from an employee's social media site.

Refer to Schedule 2 to Code of Conduct: Bullying, Harassment and Anti-Discrimination Policy for further information.

5.4 Conflicts of interest

A conflict of interest may arise from associations made through social media. This is when an employee's personal interest could influence, or be perceived as influencing, the performance of the employee's official duties and responsibilities.

This relates to associations that may be considered contrary to the role of the employee or the operations of the Employer. Employees are required to declare any conflict of interest.

5.5 Confidentiality of information

Employees are not to divulge or discuss any confidential or personal information obtained as an employee of the Employer. This includes information regarding the Employer operations, business, clients, services, prices, financial position, security, or activities.

Employees are not to identify any other employee or publish personal details or images about another employee without that employee's permission.

5.6 Use of The Employers email or logo

Under no circumstances are employees to use the Employer email addresses or logos as part of their personal social media activities or post images of themselves or any other employee in uniform or exercising official duties.

However, it is permissible to use your the Employer email address for LinkedIn or other professional networking sites only in a professional capacity.

5.7 Security risks

Social media sites can contain a significant amount of personal information. Accordingly, it is in the best interests of employees to ensure appropriate and effective security and privacy settings are established, where available, to allow only restricted access to their sites.

Employees, however, need to be mindful that regardless of the security and privacy settings, content may still be made public (e.g. a contact may cut and paste comments onto another site) or may be illegally accessed by cybercriminals.

Furthermore, unintended invitees may gain access to a social network site through a linked association (e.g. friend of a friend). Some individuals and organisations, including criminal organisations, use social media to mask their true identity and obtain personal information. It is recommended that employees exercise caution with respect to the type of information that they post on such sites.

5.8 Reporting

It is expected that all employees will comply with this Policy. Employees who fail to comply with this Policy may be subject to counselling, directions to withdraw posted material, or disciplinary action, which may include dismissal.

All employees have an obligation to immediately report any breach of this policy to their managers. Managers are to report any breach of this policy or seek advice from the Director.

6. Internet Use

6.1 Acceptable Use of Internet

Employees are permitted to use the internet for work-related purposes. Limited personal use is allowed, provided it does not interfere with work performance, breach company policies, or contravene any applicable laws. Examples of acceptable use include:

- Accessing work-related websites and resources.
- Limited personal use during breaks, provided it does not disrupt workplace operations.

6.2 Prohibited Use of Internet

The following activities are strictly prohibited:

- Accessing, downloading, or distributing obscene, sexually explicit, or offensive material.
- Engaging in illegal activities, including but not limited to copyright infringement, fraud, or harassment.
- Using the internet for excessive personal use during work hours.
- Sharing confidential company information without authorisation.
- Visiting websites unrelated to work, such as social media, online shopping, or gaming sites, during work hours.
- Monitoring and Compliance

6.3 Employer Monitoring of Internet Use

The Employer reserves the right to monitor internet usage to ensure compliance with this policy. Monitoring may include:

- Logging data such as websites visited, duration of use, and content accessed.
- Intercepting and recording internet activity, including emails and downloads, where necessary.

Employees will be informed of this monitoring through this policy, which is provided upon commencement of employment and is accessible at all times. Monitoring will be conducted in compliance with the *Privacy Act 1988* (Cth) and other relevant legislation.

The Employer is committed to protecting the privacy of employees. Any Employer monitoring will be conducted in a lawful and non-intrusive manner, and any personal information collected will be handled in accordance with the Australian Privacy Principles under the *Privacy Act 1988* (Cth).

6.5 Consequences of Breach

Any breach of this Policy may result in disciplinary action, up to and including termination of employment. Disciplinary action will be proportionate to the severity of the breach and may include suspension of internet access, formal warnings, or dismissal.

Employee Complaints, Disputes and Grievances Policy		
Version #: 1	Authorised by: AS	Original Issue: Nov 2025
Last Review Date: Nov 2025	Reviewed by: OA	Next Review Date: Nov 2026

Policy context:	
Related Policies and Documents	Code of Conduct Schedule 2 to Code of Conduct: Bullying, Harassment and Anti-Discrimination Policy Unsatisfactory Performance, Misconduct, Discipline and Termination Policy
Legislation or Other Requirements	<i>Anti-Discrimination Act 1991 (Qld)</i> <i>Human Rights Act 2019 (Qld)</i> <i>Age Discrimination Act 2004 (Cth)</i> <i>Australian Human Rights Commission Act 1986 (Cth)</i> <i>Disability Discrimination Act 1992 (Cth)</i> <i>Racial Discrimination Act 1975 (Cth)</i> <i>Sex Discrimination Act 1984 (Cth)</i> <i>Work Health and Safety Act 2011 (Qld)</i> <i>Work Health and Safety Regulation 2011 (Qld)</i>

1 Purpose

This Policy sets out Beenleigh Steel Fabrications Pty Ltd's and BSF Mobile Cranes Pty Ltd's (the Employer's) commitment to resolving disputes promptly and explains the specific process to be followed when complaints and disputes arise.

2 Scope

This Policy will apply to all employees of the Employer.

3 Policy

The Employer recognises that from time-to-time, staff may experience difficulties in the workplace which requires resolution. Unless detailed specifically in another Policy, the following procedure should be used for resolving a workplace difficulty.

As part of its commitment to resolving issues promptly employees may raise concerns, complaints or grievances as a way of identifying and resolving issues in a constructive manner. The process should be seen to be both fair and positive for all parties and should, as far as possible, achieve a positive outcome as soon as possible.

Some examples of complaints, disputes or grievances that may occur are:

- Work environment problems including WHS;
- Work related conflicts;
- Concerns regarding professional or career development opportunities;
- Lack of organisational communication;
- Direct or indirect pressure not to follow established policies and procedures.

Complaints, disputes or grievances may arise from any act, situation, decision or omission that is considered unfair, discriminatory, intimidating or unjustified.

Issues relating to discrimination, bullying and harassment are addressed by separate policies and procedures.

Employees have the right to raise complaints, disputes or grievances through the procedures designed to protect them and to have a harmonious and safe workplace in which to operate.

The person against whom the complaints are made must also have an opportunity to present their case in a fair, unbiased environment and to be kept apprised of any action being taken to investigate an incident.

4 Procedure

4.1 Self Help

If an employee considers they have grounds for a complaint, dispute or grievance they must in the first instance, and depending on the seriousness of the issue, attempt to address the problem themselves.

Where possible, the staff member should speak directly with the person with whom they have the difficulty, whether this is a behavioural issue or a workplace process. Self-help is an important step aimed at addressing and resolving the problem at an early phase. It allows the individual to remain in control of the process, keeps the issue at a local level and stops any offending behaviour before it escalates into a problem. However, it is acknowledged that this approach is not usually appropriate for serious or ongoing issues.

4.2 Informal Complaint

If a staff member feels they are unable to speak to the person directly, or the matter is of a serious nature, they should speak to the senior managers who may handle the matter in an **informal** manner. Where the staff member's concerns are against the Director, the employee may approach management.

Most complaints are able to be resolved through a managed discussion process at this informal level.

In circumstances involving more serious issues, or issues where there is a breach of Policy or risk to health and safety, the Director instigate a formal investigation. If this occurs, all efforts will be taken to ensure that the aggrieved staff member is consulted throughout the process.

4.3 Formal Complaint

An employee who has a grievance with a workplace decision, process or behaviour is entitled to make a complaint. Staff members who make a formal complaint must not be victimised, treated differently, or suffer retaliation for the mere fact of making the complaint as this is unlawful.

Employees intending to make a formal complaint can initially discuss the issue with the General Manger or Director. Where a complaint is made against the Director, the employee may approach the General Manager, who will undertake an investigation in line with the procedures detailed in this policy.

A formal complaint must be documented (e.g. made in writing) detailing the facts (that is, *Who* the matter involves, *What* occurred, *When* it occurred as to dates and times and *Where* it occurred), and given to the Director. Once a formal complaint has been received in writing, the employee who has made the complaint will receive a response within seven working days regarding the process of the investigation and/or its outcome (if known at that time).

4.4 Workplace Investigation

Upon receiving a formal complaint, the Director (or appropriate person appointed by the Director) will make a preliminary determination as to whether there is any substance to the complaint and/or if the complaint is vexatious.

If the complaint has been determined to have substance and not to be vexatious, the workplace investigation will commence. The Director will either conduct the investigation or advise who the investigator will be; who this person is may vary depending on the nature of the complaint.

The investigation may include:

- Obtaining details of the allegations claimed;
- Talking to witnesses;
- Talking to the person against whom the allegations are made and providing them with details of the allegations (how this is handled may vary depending on the nature of the allegations);
- Checking employment records.

It is expected that throughout the grievance process, staff will perform their usual duties in the normal way. If the nature of the grievance means that this cannot occur then the Director will discuss any issues with the employee and appropriate changes may be made.

During the course of an investigation, the Employer has the authority to suspend, on full pay or without pay, the employee the subject of the investigation for the purpose of ensuring that it is properly conducted and to ensure employee safety, if relevant.

4.5 Outcome of Workplace Investigation

Following the workplace investigation, the investigator will present the findings to the appropriate Company officer – usually the Director (except where the Director is the person involved directly in the complaint, dispute or grievance, then an appropriate manager will be nominated as the appropriate officer).

No decision will be made prior to the finalisation of the investigation. The appropriate Company officer will, on the basis of evidence and the report, determine whether the alleged conduct occurred and what action should be taken.

If the complaint is substantiated, the appropriate officer will:

- Ensure that steps are put in place to remove the offending behaviour or workplace process;
- Provide feedback to parties and also to witnesses (where appropriate);
- Implement an immediate action plan and follow-up action at a later date;
- Take appropriate action, which may include the Company taking disciplinary action (including formal counselling, a formal warning or termination of

employment) against the employee whose conduct is found to be in breach of Company policies.

If the complaint is not substantiated, The Company officer will:

- Provide feedback to parties and also to witnesses (where appropriate);
- Protect the reputation of the person against whom the allegations have been made;
- Explain the outcome of the investigation to affected parties. The reasons for the findings will be explained to the employee making the complaint and the staff member against whom the allegations were made; and
- Implement appropriate follow-up action at a later date that will be communicated to the employee making the complaint.

4.6 Confidentiality

Investigations will only be discussed with relevant employees or any other person as necessary for the resolution of the grievance. The involvement of other people (e.g. witnesses) should be kept to a minimum to maintain confidentiality, but sufficient to establish firsthand factual evidence where possible. All individuals who participate in a workplace investigation are involved on a “need to know” basis.

All parties may be requested to sign a confidentiality agreement. Whether such a confidentiality agreement is signed or not, the Company takes the confidentiality of a workplace investigation extremely seriously and any breach of confidentiality in this respect will be treated as a breach of this policy and may result in disciplinary action which may include a Written Warning or even termination of employment. The Employer has no tolerance for breaches of confidentiality in relation to workplace investigations.

4.7 Support Person

At any stage of the grievance procedure, an employee may utilise the assistance of an appropriate support person. Such a person may be a work colleague, a friend, family member or union officer. When a person acts in the capacity of a support person, they are not there to be an active part of the investigation. They are there purely to provide ‘moral support’ to the staff member in pursuing the grievance process and have no influencing or implementation power.

It may be at times that a nominated support person is inappropriate and in such circumstances the employee may be asked to choose another support person. A support person is required to maintain confidentiality at all times during and after any investigation.

4.8 Employee Responsibilities - Vexatious and False Complaints

It is a breach of this Policy and the Code of Conduct for a person to make a vexatious or false complaint (e.g. a maliciously exaggerated allegation). Once this has been proven or established, the person making the claim may be subject to disciplinary action on the basis of misconduct or serious misconduct.

All employees should be aware that they are directly responsible and legally liable for their own decisions, actions and behaviours in the workplace. A person against whom a vexatious or false complaint is made also has the right to seek redress if they so choose outside the confines of their employment with the Employer.



Failure to comply with the Employer's policies and procedures, in particular the Code of Conduct, may lead to disciplinary action including termination of employment.

Leave Policy		
Version #: 1	Authorised by: AS	Original Issue: Nov 2025
Last Review Date: Nov 2025	Reviewed by: OA	Next Review Date: Nov 2026

Policy Context:	
Related Policies and Documents	Code of Conduct
Legislation or Other Requirements	<i>Fair Work Act 2009 (Cth)</i> <i>Fair Work Regulations 2009 (Cth)</i> <i>Domestic and Family Violence Protection Act 2012 (Qld)</i> <i>Privacy Act 1988 (Cth)</i> <i>Paid Parental Leave Act 2010 (Cth)</i> Relevant Modern Awards

1 Purpose

Annual leave, personal/carer's leave, compassionate leave and unpaid parental leave form part of the National Employment Standards (NES) which are contained within the *Fair Work Act 2009* (Cth) and apply minimum entitlements to all employees covered by the national workplace system.

The purpose of this Policy is to provide effective management of leave entitlements for employees of Beenleigh Steel Fabrications Pty Ltd, BSF Mobile Cranes Pty Ltd and BSF Design Solutions Pty Ltd (the Employer) in accordance with the NES by ensuring:

- employees utilise their annual leave entitlement on an annual basis.
- the administration of personal/carer's leave is effective and includes policy of the Employer and factors to be considered for extended leave applications.
- access to compassionate or bereavement leave where an employee's immediate family member or a member of the employee's household, has a personal illness or injury that poses a serious threat to their life or who passes away and also providing guidelines relating to discretionary leave that may be approved by the Director over and above the standard period of compassionate leave.
- eligible employees have their applications for parental leave actioned in the most efficient way
- the guidelines are set out for the granting and management of leave without pay.

2 Scope

This Policy will apply to all managers and employees of the Employer however, leave entitlements may not apply to casual employees.

3 Annual Leave Policy

The Employer is committed to ensuring that all employees (except for casual employees) have access to paid annual leave to provide a balance between work and home life and to guarantee the safety and wellbeing of employees. As such the Company will:

- Consider every application for annual leave, and where suitable to the operational or service needs to the organisation, grant the leave application;
- Encourage staff to utilise their accrued annual leave entitlements on an annual basis;

4 Procedure for Applying for Annual Leave

4.1 General

All employees (other than a casual employee) shall be entitled to twenty days (or pro-rata for part-time employees) paid annual leave days in accordance with the relevant award for each completed year of service with the Employer.

Annual leave applications must be made in writing and approved in advance by the Director. Leave applications will be approved giving consideration to operational requirements of the business.

4.2 Public Holidays

Public holidays will be paid as they occur during any period of annual leave.

4.3 Excessive Annual Leave Accrual

In certain circumstances, the Employer may direct annual leave to be taken where an excessive amount of paid annual leave of 8 weeks has accrued. The Employer will give a minimum of four weeks' notice of excessively accrued paid annual leave to be taken.

4.6 Cashing Out of Annual Leave

- a. Each cashing out of a particular amount of paid annual leave must be the subject of a separate agreement.
- b. An Employer and an employee may agree in writing to the cashing out of a particular amount of accrued paid annual leave by the employee. This agreement must:
 - i. state the amount of leave to be cashed out and the payment to be made to the employee for it;
 - ii. stated the date on which the payment is to be made; and
 - iii. be signed by the Employer and employee and, if the employee is under 18 years of age, by the employee's parent or guardian.
- c. The payment must not be less than the amount that would have been payable had the employee taken the leave at the time the payment is made.
- d. An agreement must not result in the employee's remaining accrued entitlement to paid annual leave being less than 4 weeks.
- e. The maximum amount of accrued paid annual leave that may be cashed out in any period of 12 months is 4 weeks.

- f. The Employer must keep a copy of any agreement under clause 4.6(b) above as an employee record.
- g. The Employer will not exert undue influence or pressure on an employee to make, or not to make, an agreement to cash out annual leave.

5. Personal/Carer's Leave Policy

Employees shall be entitled to take all periods of personal/carer's leave as prescribed by the NES. This Policy ensures that applications for personal/carer's leave are processed in a fair and consistent manner across the Organisation.

6. Personal/Carer's Leave Procedure

The Employer has a standard leave application form which must be completed and approved by the Director on each occasion that personal/carer's leave is taken.

Employees must notify their direct manager as soon as reasonably possible on any day they are unable to attend for work. Employees are also expected to keep their direct manager informed as to their situation and when they expect to return to work.

The Employer may, at its discretion, notify the employee that a medical certificate is required to support a claim for such leave. Where it is impractical for an employee to obtain a medical certificate, the employee may provide a statutory declaration to the Company regarding their absence on such leave.

6.1 Paid Personal/Carer's Leave

Employees (other than casual employees) shall receive paid personal/carer's leave in accordance with the relevant provisions in the applicable employment agreement or where none apply, in accordance with the NES.

The NES provide full time employees with ten days of paid personal/carer's leave for each completed year of service, which accrues progressively during the year and from year to year, but is not paid out on termination of employment. This means that part-time employees accrue paid personal/carer's leave on a pro-rata basis, compared to the full-time entitlement of 10 days, according to the hours worked by the employee. Casual employees do not receive payment for personal illness or injury, or an unexpected emergency.

The Employer does not grant personal/carer's leave in advance of the employee's entitlement being accrued. Any absence that arises where the employee does not have a current leave entitlement will be treated as unpaid personal/carer's leave.

The Employer, at its sole discretion, may approve applications for extended paid personal or carer's leave. In considering applications for extended paid leave the Company will take into account the following:

- The work history of the employee;
- The length of service of the employee;
- The severity of the illness or ailment affecting the employee or their dependants;
- Any other compassionate grounds that may be relevant to the request.

6.2 Unpaid Personal/Carer's Leave

Where an eligible employee has used their full entitlement to paid personal/carers leave, they may take up to two days unpaid carer's leave on each occasion that a member of the employee's immediate family or household requires care and support due to illness, injury or unexpected emergency.

7. Compassionate Leave Policy

Compassionate leave is leave that can be taken to allow employees to spend time with a family or household member who has developed a life-threatening illness or injury, or to grieve and manage arrangements following the death of such a family or household member. The Employer will ensure that the administration of compassionate leave is effective, efficient and consistent with the NES personal leave allowance. We will also ensure that the rules relating to compassionate leave are applied consistently across the Company.

8 Compassionate Leave Procedure

8.1 General principles

Compassionate leave is a separate entitlement to the 10 days of paid personal/carers leave which accrue over the year. The entitlement to compassionate leave arises if an employee's immediate family or a member of their household has a personal illness or injury that poses a threat to their life or dies.

All employees, except casual employees, shall be allowed to take up to two days of paid compassionate leave on each occasion when such leave is required. Casual employees shall be allowed to take up to two days of unpaid compassionate leave on each occasion when such leave is required.

There is no limit on the number of permissible occasions for which compassionate leave may be taken by any employee however, evidence which supports the need to take such leave may be required and must be provided if requested.

The two days of compassionate leave may be taken as:

- A single two-day period; or
- Two separate periods of one day each; or
- Any separate periods to which the Company agrees.

9. Family and Domestic Violence Leave Policy

Family and Domestic Violence Leave is violent, threatening or other abusive behaviour by a close relative of a person, a member of a person's household, or a current or former intimate partner of a person, that seeks to coerce or control the person and causes the person harm or to be fearful.

As part of our commitment to providing a safe, supportive, and inclusive workplace, the Employer aims to offer comprehensive assistance to team members experiencing such circumstances while complying with the legal requirements outlined in the *Fair Work Act 2009* (Cth), the *Domestic and Family Violence Protection Act 2012* (Qld), applicable modern awards, and other relevant workplace laws.

Family and Domestic Violence Leave may be taken by an employee to:

- Arrange for the safety of the employee or their family members (including relocation);
- Attend medical, legal, or counselling appointments;
- Attend court hearings or access police services;
- Make arrangements for children's safety and schooling; or
- Undertake other activities related to family and domestic violence.

10. Family and Domestic Violence Leave Procedure

Employees may request Family and Domestic Violence Leave by direct notification to their manager or the Director. Notice should be provided as soon as practicable, acknowledging that advance notice may not always be possible.

To receive Family and Domestic Violence Leave, the employee may be asked to provide evidence which could include, Evidence Requirements police reports or incident numbers, court documents or protection orders, documents from family violence support services, medical certificates or reports, statutory declarations or other reasonable evidence that substantiates the leave request.

The evidence received by the Employer will be treated with strict confidentiality and employees will not be required to provide graphic or unnecessary details. Evidence requirements will be waived where obtaining such evidence would cause undue hardship or risk to the employee.

All information relating to Family and Domestic Violence Leave will be stored securely in accordance with the *Privacy Act 1988* (Cth), accessible only to authorised personnel on a strict need-to-know basis and handled in compliance with the Employer's Privacy Policy and relevant privacy laws. Information will only be disclosed with the employee's express written consent or where required by law or to protect the safety of the employee or others.

Support Services and Flexible Work Arrangements

Depending on the circumstances, workplace supports that may be offered to the employee suffering Family and Domestic Violence include:

- Access to Employee Assistance Program services for employees and their immediate family members;
- Workplace safety planning;
- Security measures as reasonably required;
- Payroll adjustments for financial security.

An employee affected by Family and Domestic Violence can also seek external support services such as by calling 1800RESPECT (ph. 1800 737 732), which is a 24/7 National Sexual Assault and Domestic Violence Counselling Service, or Men's Referral Service (ph. 1300 766 491).

10.1 Paid Family and Domestic Violence Leave

All employees, including casual employees, are entitled to 10 days of paid Family and Domestic Violence Leave per year, which is available from the employee's first day of employment and does not accrue progressively. The entitlement resets annually on each employee's work anniversary and does not carry over to the following year if unused. The leave can be taken as a single continuous period, separate periods of one or more days, or

any separate periods agreed upon by the Employer and employee, including periods of less than one day.

For casual employees, payment will be up to 10 workdays per year calculated based on:

- The hours that would have been worked during the leave period as per their regular roster; or
- Their average weekly hours over the previous 12 months, whichever is greater.

10.2 Unpaid Family and Domestic Violence

All employees, including casual employees, are entitled to 5 days of unpaid family and domestic violence leave in a 12-month period after they have exhausted their paid entitlements. This entitlement is available in full at the start of each 12-month period of the employee's employment and does not accumulate from year to year. The leave can be taken as a single continuous period, separate periods of one or more days, or any separate periods agreed upon by the Employer and employee, including periods of less than one day.

10.3 Additional Leave Options

Upon exhaustion of Family and Domestic Violence Leave entitlements, employees may access either personal/carer's leave, annual leave, long service leave (if eligible), or unpaid leave by agreement with the Employer.

Access to additional leave will be assessed on a case-by-case basis in consultation with the employee.

11. Parental Leave

12. Unpaid Parental Leave Scope

This policy applies to all full-time and part-time employees as well as eligible casual employee of the Employer.

13. Unpaid Parental Leave Policy

The Employer is committed to being a family friendly organisation that will facilitate the taking of parental leave in accordance with the NES and any other such applicable industrial instruments.

Employees do not accrue annual leave entitlements during the unpaid parental leave period. However, approved unpaid parental leave does not break continuity of service.

14. Unpaid Parental Leave Procedure

14.1 Unpaid Parental Leave Entitlement

Eligible employees are entitled to:

- up to 12 months of continuous *unpaid parental leave*; and
- the right to request an additional 12 months of leave, subject to Employer approval.

Eligible employees may take up to 100 days of their 12-month unpaid parental leave entitlement as *flexible parental leave*. Flexible parental leave:

- must be taken within 24 months of the child's birth or adoption;
- may be taken in periods of one day or longer; and
- may be taken non-consecutively.

14.2 Unpaid Parental Leave Eligibility

Full-time and part-time employees (including same sex or de-facto couples) are eligible for unpaid parental leave if they have completed at least twelve months' continuous service with the Company immediately before:

- the date of birth or expected date of birth; or
- the date of placement or expected date of placement for adoption.

To be eligible, casual employees must be considered regular casuals, that is, those casuals who have been employed on a regular and systematic basis for at least 12 months immediately before the date of the birth or expected birth of the child (or the day or expected day of placement in the case of adoption). Additionally, the regular casual employee must have a reasonable expectation of continuing employment on a regular and systematic basis but for the birth or placement of the child.

Where both parents are employed by the Employer:

- each parent may take separate periods of up to 12 months of unpaid parental leave; or
- one parent may request an extension beyond the initial 12-month period.
- the combined leave period must not exceed 24 months.

Adoption leave is only available in relation to the adoption of a child under sixteen years of age as at the date of placement, who has not lived continuously with the employee for six months as at the date of placement.

14.3 General Requirements for Taking Unpaid Parental Leave

Unpaid parental leave may start:

- For a pregnant employee taking birth-related leave, the period of unpaid parental leave may start:
 - Up to six weeks before the expected date of birth of the child; or
 - Earlier, if the Employer and employee agree; or
 - During the 24-month period starting on the date of birth of the child. However, the leave must end during this 24-month period.
- For an employee who is not giving birth, the unpaid parental leave must start on the date of birth of the child or the date of placement of the child in the case of adoption

Where the employee's spouse or de facto partner has responsibility for the care of the child (and is not also an employee) the employee's leave may start anytime within twelve months after the date of birth or day of placement of the child if he or she is the primary caregiver thereafter.

The Employer may direct a pregnant employee to start unpaid parental leave up to six weeks before the expected date of birth of the employee's child if the Company considers (based on medical evidence) that there is a risk to the employee in working in their present circumstances. This risk might arise because of a pregnancy related illness and / or potential hazards connected with the employee's work.

14.4 Procedural Requirements for Taking Unpaid Parental Leave

An employee is required to apply for parental leave, providing the Employer with the following Notice:

- for continuous unpaid parental leave, initial notice of intended leave dates to be provided by the employee to the Company at least 10 weeks before start date.
- for continuous unpaid parental leave, confirmation of notice to be provided by the employee to the Company at least 4 weeks before commencement.
- for flexible unpaid parental leave, at least 4 weeks' notice is required to be provided by the employee to the Company before each period of leave is taken.

When providing the above notice to the Company, employees must include evidence that would satisfy a reasonable person of their eligibility to parental leave, including:

- medical certificates confirming pregnancy or expected date of birth
- adoption documentation
- statutory declarations where required.

Additional evidence may be required for fertility treatment documentation, surrogacy arrangements of permanent care orders.

During parental leave, the Employer will:

- maintain reasonable contact with the employee
- notify of significant workplace changes
- consult regarding the impact of changes.

Subsequently, employees must ensure that their contact details are up to date at all times and provide reasonable notice of any changes to leave arrangements to the Company.

14.5 Unpaid Special Parental Leave

A pregnant employee is entitled to a period of unpaid special parental leave if she is not fit for work during that period because:

- of a pregnancy-related illness; or
- they have experienced a miscarriage, termination of pregnancy, or stillbirth within 28 weeks of the expected date of birth.

The employee must notify their Employer as soon as practicable of their intention to take unpaid special parental leave and advise the expected duration of the leave. The Employer may require the employee to provide evidence that would satisfy a reasonable person of the need for and duration of the leave, such as a medical certificate or statutory declaration.

The period of unpaid special parental leave is separate from and additional to any other leave entitlements does not reduce the employee's entitlement to 12 months of unpaid

parental leave. An employee may elect to take any paid leave entitlements (such as annual leave or long service leave) in place of, or in conjunction with, unpaid special parental leave.

All information provided by the employee regarding their need for unpaid special parental leave will be treated confidentially and in accordance with applicable privacy laws.

14.6 Transfer to a Safe Job

A pregnant employee may request transfer to a safe job if they provide evidence that:

- They are fit for work but it is inadvisable to continue in their present position during pregnancy; and
- The evidence is from a registered medical practitioner.

If an appropriate safe job is available, the employee will be transferred to that position for the risk period, with no change to terms and conditions of employment. The employee will receive their full rate of pay for the position they were in before the transfer for the hours worked in the safe job. If no appropriate safe job is available, the employee is entitled to paid 'no safe job leave' at their base rate of pay for ordinary hours of work during the risk period. The arrangement will be reviewed at the request of either party, if medical circumstances change or every four weeks to ensure continued appropriateness.

The transfer or paid leave will continue until:

- The commencement of parental leave; or
- The end of the pregnancy; or
- The risk period ends as certified by a registered medical practitioner.

The Company will:

- Consult with the employee about available safe job options;
- Document the risk assessment process;
- Provide written confirmation of the transfer arrangements or if no safe job is available.

14.7 Requesting an Extension to Unpaid Parental Leave

An employee may request an additional period of unpaid parental leave of up to twelve months. The employee must first have taken their full entitlement to twelve months' parental leave before making this request. Any proposed extension must be continuous with the employee's unpaid parental leave.

An employee must provide at least four weeks' notice in writing before the end of the employee's initial period of leave requesting an extension. The Company must respond in writing to the written request as soon as practicable and not later than 21 days after the request is made.

A request may only be refused on reasonable business grounds. The Company must give reasons for refusal. Reasonable business grounds may include, for example:

- inability to organise work among existing staff; or
- inability to recruit a suitable replacement employee.

14.8 Returning to Work

Employees are entitled to return to work in the position they held before taking parental leave. The pre-parental leave position does not include any temporary 'safe' position the employee may have held while pregnant.

If the Company makes a decision that will have a significant effect on the status, pay or location of an employee's pre-parental leave position, we must take all reasonable steps to inform the employee of that decision and give the employee an opportunity to discuss the effect of the decision on his or her position.

If the employee's pre-parental leave position no longer exists, the employee is entitled to return to an available position for which the employee is qualified and suited that is nearest in status and pay to the employee's pre-parental leave position.

An employee planning to return to work from parental leave is required to give the Company at least four weeks' written notice of the date the employee proposes to return to work.

14.9 Flexible Working Arrangements

An employee may make a Flexible Working Arrangement request to return to work on fewer hours than their pre-parental leave position, including a return on a part time basis. Any such request must be made in accordance with s 65 of the *Fair Work Act 2009* (Cth) and will be considered based on the employee's position and the operational requirements of the business and must not be unreasonably refused as per s 65A of the *Fair Work Act 2009* (Cth).

15. Paid Parental Leave

15.1 Paid Parental Leave Scope

This Policy covers all employees of the Employer who are eligible for the Federal Government paid parental leave scheme under the *Paid Parental Leave Act 2010* (Cth).

16. Paid Parental Leave Policy

The Employer is committed to being a family friendly organisation that will facilitate the taking of parental leave in accordance with the NES and any other such applicable industrial instruments.

The *Paid Parental Leave Act 2010* (Cth) provides that the period of unpaid parental leave does not include the time during which the employee receives payments under the *Paid Parental Leave Act 2010* (Cth), meaning that any period of paid parental leave entitlement is exclusive of any period of unpaid parental leave entitlement.

Employees do not accrue annual leave entitlements during the paid parental leave period. However, paid parental leave does not break continuity of service.

17. Paid Parental Leave Procedure

- a. The employee is required to lodge a claim for paid parental leave with Centrelink. Centrelink will then assess the claim to determine eligibility of the employee for the parental leave payments and the amount of payment they will receive.

- b. Once the claim is approved, Centrelink will notify the Employer as to whether the Employer is required to make the parental leave payments to the employee, based on whether the employee has been employed by the Employer for at least 12 months prior to the date of birth or expected date of birth of the child and how many weeks payments the employee is eligible to receive.
- c. The Employer will then provide Centrelink with specific information for sufficient funds to be transferred to the Employer's nominated bank account before the usual payroll cycle.
- d. The Employer will then pay the parental leave to the eligible employee through our usual payroll system, including deducting PAYG tax from the instalments. The Employer is not obligated to make superannuation contributions in respect of parental leave pay.

18. Leave Without Pay Policy

Employees shall be entitled to take all periods of unpaid leave as prescribed by the NES. However, in other circumstances leave without pay is generally not encouraged by the Employer.

18.1 Leave Without Pay Procedure

18.2 Leave Without Pay - Domestic or Personal Reasons

- a. The Employer may approve a request where an employee requires leave without pay to attend to domestic or personal matters. However, this will only be granted if the employee has no outstanding annual leave entitlement and will not usually exceed one or two days in duration. Approval will be subject to work requirements and is at the discretion of the Director.
- b. During periods of unpaid leave, employees will not accrue entitlements to paid leave (for example personal/carer's leave, annual leave, or long service leave). However, absence on approved leave without pay will not break the employee's continuity of service.

18.3 Leave Without Pay – Overseas Travel

The Employer may approve a request where an employee seeks extended unpaid leave of absence e.g. for the purpose of overseas travel. This may be granted at the discretion of the Director of leave without pay.

18.4 Terms and Conditions of Agreement

Applications for leave without pay should be submitted on the Company's Annual Leave Application Form as far in advance as possible, along with the reasons for the request.

The terms and conditions under which any leave of absence is taken will be advised in writing by the Director.

Where there is extended leave without pay agreed, and it is not possible to guarantee employment on return, it may be necessary to terminate the employee's current employment with a recommendation for re-employment on return should a suitable vacancy be available.

19. Unauthorised leave – Abandonment of employment

When an employee is absent from work for a period of 7 consecutive working days without notifying the employee's manager, and without the Employer's consent, and have the Employer has taken reasonable steps to contact the employee as per the steps provided below, this will be indicative of the employee having abandoned their employment. The employee will be considered not to have been ready, willing and able to work and will not be paid for the period they are absent from work without authorisation.

The Employer will take reasonable steps to confirm the employee's abandonment of employment by attempting to contact the absent employee several times and through different mechanisms (e.g. by telephone, SMS, email, contacting the employee's emergency contact).

A failure of the employee to respond to such attempts at contact by the Employer, or provide a reasonable excuse for their absence, will be deemed as the employee having left their employment with no intention of returning. This will be considered a termination of employment at the employee's initiative.

Workplace Rehabilitation Policy		
Version #: 1	Authorised by: AS	Original Issue: Nov 2025
Last Review Date: Nov 2025	Reviewed by: OA	Next Review Date: Nov 2026

Policy Context:	
Related Polices and Documents	Code of Conduct Schedule 3 to Code of Conduct: Workplace Health and Safety Policy
Legislation or Other Requirements	<i>Workers Compensation and Rehabilitation Act 2003 (Qld)</i> <i>Work Health and Safety Act 2011 (Qld)</i> <i>Work Health and Safety Regulation 2011 (Qld)</i>

1 Purpose

This Policy sets out clear guidelines for the rehabilitation of employees of Beenleigh Steel Fabrications Pty Ltd, BSF Mobile Cranes Pty Ltd and BSF Design Solutions Pty Ltd (the Employer) that have an accepted and existing workers compensation claim.

2 Scope

This Policy applies to all employees of the Employer.

3. Policy

The Employer recognises that there are substantial benefits to be gained from rehabilitation principles and practices and is committed to implementing them in the workplace.

Experience has shown that workplace rehabilitation assists the healing process and helps restore the employee's function. Workplace rehabilitation includes the early provision of timely and adequate services, including suitable duties programs, and aims to:

- Maintain injured or ill workers at work where possible; or
- Ensure the employee's earliest possible return to work.

The Employer will ensure appropriate suitable duties are made available to injured or ill employees where possible, and where service operations allow, to facilitate their early return to work. These duties will be consistent with medical certificates and advice.

The Employer will respect at all times the confidential nature of medical and rehabilitation information. Injured or ill employees returning to work will be consulted to ensure a structured and safe return to work that will not disadvantage them.

4 Procedure

4.1 Suitable Duties Plan

The allocation of duties at the workplace is a means of providing a monitored and graduated return to normal duties. They will be:

- Matched to the capabilities or restrictions of the injured or ill employee; and
- Time limited and regularly upgraded according to the recovery of the employee and treating medical practitioner's advice.

The following issues will be considered when choosing suitable duties:

- The operational or service needs of the Employer
- The employee's pre-injury or illness duties, age, education, skills and work experience and nature of the incapacity
- Any restrictions or limitations specified by the treating medical practitioner who must document approval for all plans and any amendments to the plans
- The duties are meaningful and have due regard for the employee's rehabilitation.

A copy of the plan will be provided to the employee and any agencies involved in the rehabilitation process.

4.2 Roles

4.2.1 Role of Person Coordinating the Return to Work

The role of the person coordinating the return to work will be undertaken by the Director who will be a link between the relevant parties which may include the injured or ill employee, relevant medical practitioners responsible for treating the employee, WorkCover Queensland and any other relevant parties in creating a return-to-work plan.

The person coordinating the return to work will specifically be responsible for:

- Development of a suitable return to work program or plan
- Maintenance of accurate and objective case notes of all communications, actions and decisions, and their reasons, and to sign and date each note
- Ensuring an efficient system exists for the reporting of injuries through the Work Health and Safety policy and process
- Ensuring confidentiality of information received
- Support and encouragement to injured or ill employees.

4.2.2 Role of the Injured or Ill Employee

- To apply for workers' compensation (if eligible)
- Advise their doctor of the availability of workplace rehabilitation
- Actively participation in workplace rehabilitation
- Maintain communication with the Employer and the Director about relevant issues related to their claim
- To enter into active consultation regarding the development of a suitable duties plan
- To authorise the Director to contact their doctor for advice on suitable duties.

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Policy Context:	
Related Polices and Documents	Code of Conduct
Legislation or Other Requirements	

1 Introduction

Established in 1980, Beenleigh Steel Fabrications Pty Ltd (BSF) is a privately-owned and operated Australian industry leader in the supply, fabrication, and erection of medium to heavy structural steel servicing both the public and private sectors.

BSF's legacy is an impressive and varied body of work: from stadiums, bridges and hospitals to army barracks, multi-level car parks and rail stations. Please refer to our website, beenleighsteel.com.au which details some of the landmark structures we have fabricated and erected over the years – often to critical acclaim. Our portfolio highlights our reliability and versatility in successful project delivery, cementing our reputation as steel specialists and experts in every facet of our service catalogue.

BSF is a provider of steel fabrication and erection services to the construction industry, with our focus being on repeat business. In order to remain top performers in the industry, we seek continuous improvement and maintain our health and safety, quality and environment management systems to the highest standards.

2 Structural Steel Fabrication

Centrally located between Brisbane and the Gold Coast in Berrinba, Logan City, our head office and workshop have a combined work floor space of 3900m², which is serviced by a workforce of 100 skilled local tradesmen on average including apprentices and trainees. Our in-house fabrication facility can operate day and night and includes processing, cutting, holing and welding with a potential annual output of up to 10,000 tonnes.

We specialise in architectural steelwork for architectural finishes, requiring the highest standard of work. Projects undertaken include areas with large domed skylights, facades and complex infill panels.

3 Structural Steel Erection & Rigging

BSF maintains a flexible site workforce with an average of 50 skilled tradesmen including riggers and boilermakers having extensive experience in steel and precast erection. General rigging services are also offered for projects such as setting up the barricades for the Gold Coast 600 Supercars track, erection of aluminium helipads, and the installation of facades.

4 Crane Hire

BSF Mobile Cranes Pty Ltd (BSFMC) offer complete lifting, transport, and rectification solutions. BSFMC has an experienced, in-house crew of crane drivers, riggers, dogmen, supervisors, and operation management staff including a full-time safety advisor. Their growing fleet of modern plant consisting of a variety of cranes from 1t to 300t are all serviced at a purpose-built facility in Logan Village, south of Brisbane.

Please visit our website www.bsfmobilecranes.com.au

5 Concrete Scanning

To reduce downtime on site and accelerate works, BSF has invested in the equipment and training for concrete RF scanning enabling us to find reo, stressing cable, electrical cables and other services hidden in the concrete before drilling. In some cases, steelwork requires modifying to suit these conditions. This is achievable by working closely with our draftsmen.

Our GPR equipment is specialised in detecting reinforcement bars and tension cables, but thanks to advanced technology, it will also detect non-metallic and energised features hidden in the concrete. Marking out the concrete surface and providing a full report of the findings provides confidence for safe cutting and drilling.

6 Design Solutions

BSF Design Solutions is a division devoted to design and construct steelwork projects. Comprising the design, engineering, drafting, surveying, fabrication, and installation of structures in-house, we provide an end-to-end turn-key service reducing costly design changes frequently experienced on conventional projects. This approach results in a successful project completed in a timely manner as it eliminates communication breakdown between the consulting parties.

BSF's can-do attitude with an open-minded first principles approach has allowed the business to expand to service principal contractors on some of the largest and most complex projects undertaken in the country.

The BSF design team services include the following:

- Design engineering for structural, concrete, and precast elements.
- Complete design and construct service from initial enquiry through to installation of steel, concrete and precast elements.
- Access to BSF design team knowledge for better design solutions.
- Advanced 3D Crane lift studies.
- Form 12 and 15 sign offs.

7 Third Party Accreditation

As part of our commitment to continuous improvement we have obtained third-party accreditations in crucial areas. These accreditations have not only gained us recognition in our industry but have provided valuable insights on how to improve our products, services, performance, and processes.

Current third-party accreditations/approvals include:

- Steel Compliance Australia certified Construction Category 3 under the National Steelwork Certification Scheme having conformed to the requirements of AS/NZS 5131 – Structural Steelwork and Erection
- ASI Environmental Sustainability Charter Member in collaboration with the Green Building Council of Australia (Green Star)
- Certified Enterprise Bargaining Agreements, which have been endorsed by relevant trade unions and are Fair Work Commission and ABCC approved.
- Our Quality Management System conforms to ISO 9001:2015 and was audited and certified by QMS Certification Systems
- Occupational Health & Safety Management System conforms to ISO 45001:2018; audited and certified by QMS

8 First Principles Thinking

First principle thinking has revolutionised BSF's safety culture and quality management. Questioning and breaking down assumptions into fundamental truths results in non-linear ideas that can in turn lead to opportunities for innovation that would otherwise be missed.

By thinking outside the box with a first principles approach to problems, we can take a few steps back to the core issues with an open mind and make better informed decisions resulting in highly effective preventive strategies.

Continual improvement measures alone tend to limit potential innovation because they bind ideas to the original concept and design, whereas reasoning on first principles can uncover new solutions to familiar issues. At BSF, by combining continual improvement with first principle thinking we are fine-tuning an already industry leading safety management system and are also applying this winning formula across our entire management system.

Breaking from the herd with forward thinking has given rise to new innovations, such as the development of custom software to streamline our production processes and the design and engineering of lifting equipment, rotators and other specialised solutions, some of which have been recognised and applauded by our peers for their ingenuity and efficiency.

9 Internal Management System

9.1 Scope

BSF is committed to providing a safe and healthy workplace to all parties affected by our operations. Whilst maintaining high levels of safety performance, BSF also strives to provide quality workmanship for all services provided to our clients through our internal management system.

Activities covered by the BSF internal management system include the following:

- Structural Steel Fabrication
- Structural Steel & Precast Concrete Erection & Rigging
- Crane Hire
- Design Solutions
- Concrete Scanning

9.2 Purpose

The purpose of the BSF internal management system is to provide high standards of health, safety and quality management with the aim of continuous improvement through the use of internal documents, management plans/manuals, audits, meetings, reviews, policies and procedures.

9.3 Context of The Organisation

To become top performers in our industry, we strive for a positive performance culture across our business. Our workforce and management team hold the same collective values which allows for our continued growth.

We recognise that training and personal development of our staff is crucial and encourage their progress through knowledge, skills and performance training. As an example, BSF have developed an internal software application and implemented an additional external software package which have streamlined many formerly manual processes.

9.4 Interested Parties

As members of the construction industry, BSF has many internal and external business stakeholders including regulators, third party certification bodies, clients, suppliers, subcontractors and employees. The role of our internal management system is to identify the needs and expectations of all stakeholders so that they are met, and include:

- Legal and legislative requirements for health and safety performance as well as the quality of our goods and services.
- Compliance with third party certification bodies for ISO accredited health, safety and quality management systems.
- Compliance with fair working arrangements and other industrial relations matters set out by regulators and the union.
- Workers' rights to work in an environment free from risk and hazards as far as reasonably practicable.
- Contractual agreements between ourselves and our clients to maintain high standards of health and safety for activities as well as providing quality products and services which meet the client's expectations.
- Managing, monitoring and reviewing suppliers' and subcontractors' supplies and services to ensure they are meeting our client's standard of health, safety and quality performance through regular auditing.
- Competitive pricing of products and services in line with industry expectations, which helps us to secure existing custom and future work.

9.5 Internal Documents

BSF has various internal forms, records, policies, procedures and management plans which are embedded into our internal management system. Our internal documents are continuously monitored and reviewed for their effectiveness and relevancy and where required, are revised with improvements. Any overarching documents such as policies, procedures and management plans are also endorsed by BSF's senior management.

Environmental Policy		
Version #: 1	Authorised by: AS	Original Issue: Nov 2025
Last Review Date: Nov 2025	Reviewed by: OA	Next Review Date: Nov 2026

Policy Context:	
Related Polices and Documents	Code of Conduct Schedule 3 to Code of Conduct: Workplace Health and Safety Policy
Legislation or Other Requirements	<i>Work Health and Safety Act 2011 (Qld)</i> <i>Work Health and Safety Regulation 2011 (Qld)</i>

1. Policy Statement

Beenleigh Steel Fabrications Pty Ltd, BSF Mobile Cranes Pty Ltd and BSF Design Solutions Pty Ltd (the Employer) is committed to approaching its activities with an environmentally responsible attitude and to effectively manage any risk that may lead to a negative impact on the environment. The Employer recognises that the work activities carried out by us may result in risks that lead to adverse environmental outcomes.

It is our aim to effectively manage any environmental risks to prevent and reduce any adverse effect on the environment and/or people. To achieve this, the Employer will promote a strong environmental ethic as part of its culture, analyse and identify each activity that may constitute a risk to the environment and implement the relevant environmental plan.

Any person employed/contracted to work for or on behalf of the Employer will be expected to always work carefully to protect the environment, report any potential environmental hazards to supervisors, and must comply with the Employer's environmental management procedures and relevant environmental legislation.

2 Noise Pollution

As part of our commitment to achieving the principles of health and safety in our workplace, the Employer recognise our moral and legal responsibility to provide a safe and healthy work environment for all workers, contractors, customers, and visitors. This commitment extends to ensuring that our operations and activities, both on site and in our workshops, do not place any person at risk of injury or illness due to the adverse effects of noise in the workplace.

All efforts are made to ensure that noise is controlled and that environmental legislative requirements are complied with for any activities which could potentially contaminate the environment from noise by:

- Monitoring and controlling noise levels.
- Restricting the time, location, and manner of operations.
- Erecting barriers and screens when necessary.
- Progressively phasing in noise control measures.

We will ensure the health and safety of all persons in company workplaces by controlling noise – as far as it is practicable. The Employer will implement and maintain noise control measures in a manner that ensures that the noise control is effective, and that those persons are not exposed to noise levels in excess of what is specified in the workplace health and safety Acts, Regulations, Codes of Practice and Australia Standards.

We will identify areas within workplaces where noise may be a problem, assess any risk arising from exposure to noise, and take appropriate measures to control risk from noise in workplaces. Where harmful noise levels are suspected, a noise risk assessment will be carried out by a competent person in accordance with the relevant Australian Standards.

Harmful noise levels will be reduced by elimination where reasonably practicable. Where it is not reasonably practicable to eliminate the noise, the hierarchy of noise control measures will be applied to reduce noise exposure.

3 Air Pollution

All efforts are made to ensure that air pollution is controlled and that environmental legislative requirements are complied with for any activities which could potentially contaminate the environment from airborne contaminants.

4. Water Pollution

All efforts are made to ensure that water pollution is controlled and that environmental legislative requirements are complied with for any activities which could potentially contaminate the environment from waterborne contaminants.

5 Hazardous Substances

BSF management personnel will ensure that all activities involving hazardous chemicals are carried out in accordance with applicable Acts, regulations, codes of practice, and standards. BSF will also ensure that our use of chemicals does not adversely affect the environment and that emergency procedures are in place for any potential contamination or spill.

A hazardous chemical register containing the current Safety Data Sheet together with the risk assessment will readily be available to workers using the chemical. All containers and packages of hazardous chemicals will be labelled in accordance with applicable codes of practice, and all storages signed and placard in accordance with relevant regulations.

All workers who will be using or who may be exposed to a hazardous chemical will be provided with information, instruction, and training in relation to the nature of the hazards and risks associated with the use of the chemical, and the need for, and the proper use of measures to control the risk.

Where there is a risk of exposure more than the exposure standard for the chemical, atmospheric monitoring will be carried out to determine if there is a risk to health, and workers advised of any actual or potential risk.

6 Waste Management

The Employer will ensure that processes are implemented to minimise the quantity of waste generated by the company's activities and operations, and that waste is recycled where possible, or, where it cannot be recycled, disposed of in a manner that will not cause, or will minimise harm, to the environment.

7 Environmental Procedures

To effectively control risks to the environment, the Employer have established and implemented the following environmentally friendly procedures:

- Maintaining safe storage facilities for gas cylinders and chemicals at our premises and on construction sites.
- Working in a safe manner to minimise the occurrence of accidents.
- Carrying out regular inspections on all premises to ensure that any impact on the environment is prevented or reduced.
- Ensuring that all equipment and tools, lighting and air-conditioning units are not left in stand-by mode but are switched off at the end of each day.
- Setting default printer settings on all computers to black and white to reduce colour printing and promoting a 'think before you print' mentality to significantly reduce print volumes generally.
- Recycling waste materials such as paper, cardboard, aluminium cans, steel, and toner and ink cartridges.
- The addition of a clause in our Use of Company Vehicles & Plant Policy to encourage minimal vehicle use by our employees thereby reducing our carbon footprint. Fuel consumption is monitored monthly, and excesses are addressed immediately.
- Our commitment to community engagement has now been broadcast via our website. We have a complaints register and encourage feedback on environmental issues in accord with our membership of the Environmental Sustainability Charter.
- We are now gauging the sustainability consciousness of our major suppliers by requesting evidence of their environmental credentials for our records. A new list of preferred suppliers has been compiled with sound environmental practice being the selection criterion.
- A new internal form to assign responsibility to individuals for their use of large and valuable tools taken to external work sites has been implemented to encourage greater care and thereby reduce the frequency of repairs and replacements.

8 Environmental Initiatives

The Employer is committed to continuous improvement, as such we have initiated the following:

- Ongoing membership of the Australian Steel Institute's Steel Sustainability Australia (SSA) certification program which earns Green Star points and mandates audited environmental improvement projects
- Development and implementation of an in-house software-based system to reduce our environmental footprint.

PPE Policy		
Version #: 1	Authorised by: AS	Original Issue: Nov 2025
Last Review Date: Nov 2025	Reviewed by: OA	Next Review Date: Nov 2026

Policy Context:	
Related Polices and Documents	Code of Conduct Schedule 3 to Code of Conduct: Workplace Health and Safety Policy Unsatisfactory Performance, Misconduct, Discipline and Termination Policy
Legislation or Other Requirements	<i>Work Health and Safety Act 2011 (Qld)</i> <i>Work Health and Safety Regulation 2011 (Qld)</i>

1. Policy Statement

Beenleigh Steel Fabrications Pty Ltd, BSF Mobile Cranes Pty Ltd and BSF Design Solutions Pty Ltd (the Employer) is committed to achieving and maintaining a safe working environment on all their work sites. Personal Protective Equipment (PPE) will be provided as a control measure where it is not practicable to eliminate or control the hazard effectively, or as an additional protective measure.

The purpose of this policy is to provide guidance to all employees in relation to PPE and is limited directly to employees of the Employer. Contractors are responsible for providing PPE to their own employees.

2. Aims & Objectives

To ensure that our staff are provided with the correct PPE for the task and are instructed, trained, and understand how/when to use PPE. As part of this process, we will discuss:

- An explanation of the risk present and why PPE is needed.
- How and when to use PPE.
- How to inspect and maintain PPE.
- Cleaning and storage requirements.

3. Responsibilities

The following responsibilities are issued in relation to the use of PPE:

- Management is to determine the jobs and tasks that require PPE.
- All issued PPE shall comply with the appropriate Australian Standards.
- Management will ensure that all PPE is issued with instructions for use, maintenance, and storage.
- Management is responsible for ensuring that a suitable assessment of the risks to employees is carried out, with a need to identify specific tasks that require the wearing of PPE.
- All employees are responsible for using PPE where required.

- Supervisors are responsible for ensuring that employees are adequately fitted with the PPE and trained in its use.
- Supervisors are responsible for ensuring that adequate storage for PPE is provided for when PPE is not in use.

4. Mandatory Use

When PPE is necessary, it must be used every time there is a risk of exposure. Deliberate failure to use PPE as instructed may result in disciplinary procedures being applied.

5. PPE Requirements

5.1. Clothing

The following rules apply to clothing:

- Site employees must wear high visibility protective clothing and as per site specific requirements, may be required to wear full length protective clothing.
- Workshop employees must wear full length protective clothing.
- When welding activities are being conducted, other protective clothing such as welding gloves, aprons, spats etc. will be required.

5.2. Eyewear

All site and workshop staff are required to wear appropriate eye protection (such as safety glasses and face shield for double eye protection) and must be worn where there is a risk of foreign particles entering the eye, and when using cutting or welding equipment. Other eye protection such as welding helmets will be required when welding.

5.3. Hard Hats

It is the requirement of site staff that hard hats be worn in all areas which are designated hard hat areas. Hard hats should not be written on, worn back to front, or worn with a cap underneath. Some site-specific requirements may require wide-brim hard hats.

5.4. Respiratory Protection

Respiratory protection must be used when dealing with toxic chemicals/substances, paints, thinners, dusty environments or if entering a confined area or space.

5.5. Foot Protection

All employees are required to wear enclosed footwear when at the Employer's workplaces. Steel capped boots must be worn in all workshop areas and site-based workplaces. Open footwear is not permitted at any time, unless for medical reasons with permission from Management.

5.6. Hand Protection

Gloves must be used when the user is exposed to hand injury during the activity (e.g., handling chemicals or using cutting tools).

6. PPE Care & Maintenance

All employees using PPE equipment are to sign for them in the equipment register.

Employees issued with PPE are responsible for the following:

- Using, maintaining, and storing it appropriately; and
- Arranging for the maintenance or laundering of the PPE as required. This can be organised by consultation with your supervisor.

Employees must regularly inspect their PPE for normal wear and tear, and for specific damage which may adversely affect the equipment's effectiveness. Employees should order replacements through their supervisor as required.

Quality Policy		
Version #: 1	Authorised by: AS	Original Issue: Nov 2025
Last Review Date: Nov 2025	Reviewed by: OA	Next Review Date: Nov 2026

Policy Context:	
Related Polices and Documents	Company Policy Code of Conduct Schedule 3 to Code of Conduct: Workplace Health and Safety Policy
Legislation or Other Requirements	

1. Policy Statement

It is the policy of Beenleigh Steel Fabrications Pty Ltd, BSF Mobile Cranes Pty Ltd and BSF Design Solutions Pty Ltd (the Employer) to operate our business in a manner that consistently meets or exceeds the industry standards (including ISO9001 and AS5131) and the quality standards set by our clients.

To achieve this, we require the engagement of all personnel to build relationships, provide exceptional service, seek and accept feedback, and identify actions for the continual improvement of our operations.

2. Aims & Objectives

The Employer recognise that the quality of our products and services are determined by our client's needs and expectations. Our aim is to continually improve our quality of products, services, and productivity by making sound leadership decisions based on facts to determine effectiveness in the following areas:

- Conformity of product/service to requirements of QMS by reviewing completed jobs, raising concerns in management meetings, and completing NCRs/corrective actions where required.
- Customer Satisfaction (perception and needs met) by reviewing feedback in management meetings and completing NCRs/corrective actions where required.
- Performance & effectiveness of QMS by monitoring the NCR register discussing incomplete NCRs in management meetings.
- Planning the implementation and effectiveness of QMS by reviewing completed jobs and identifying trends and discuss in management meetings, raise NCRs/corrective actions where required.
- Risk management actions taken and their effectiveness to be evaluated by reviewing completed jobs, discussing trends in management meetings, and raising NCRs/corrective actions where required.
- Performance of external providers to be monitored; report feedback during management meetings and raise NCRs where required.

- Continual Improvements to QMS by analysis of audit reports and NCR register to identify trends, discuss in management meetings, and raise NCRs/corrective actions where required.
- Identifying the changing needs and expectations of our clients.
- Developing and maintaining processes and procedures that ensure that these changes are accommodated.
- Achieving efficiency in our operations, giving attention to detail, and being responsive to client priorities
- Providing quality products and services on time and at the lowest cost possible.
- Encouraging continuous improvement among our employees.
- Establishing and maintaining a high degree of quality awareness at all levels within the company and encouraging individual initiative in achieving product quality.
- Understanding client requirements fully and ensuring achievement of our commitment to the function, reliability and quality of the goods and services we provide.
- Understanding our technology and monitoring the capabilities and performance of our processes.
- Responding positively and promptly to product quality and service complaints, ensuring that relevant remedial action is taken.
- Ensuring the efficient use of all resources available.

3. Responsibilities

We achieve our objectives by understanding our role and our individual customer's requirements. The success of our Quality Management System is determined by each and every employee's commitment to:

- Assist and cooperate in ensuring that this Policy and QMS procedures are followed.
- Actively participate in the goals and objectives of this Policy and identify improvements.
- Train all workers and contractors to identify areas where improvement can be achieved.
- Maintain maximum efficiency in our operations by reviewing the performance of our processes and tightening timeframes where possible.
- Strive to ensure that client satisfaction is always achieved.
- Be flexible, adopting new techniques and management principles where feasible in order to maintain the highest possible quality standards.
- Ensure our employees assist and cooperate in ensuring that this Policy is followed.
- Ensure our employees actively participate in the adherence of this company to the achievement of the goals and objectives of this policy.

Smoke Free Workplace Policy		
Version #: 1	Authorised by: AS	Original Issue: Nov 2025
Last Review Date: Nov 2025	Reviewed by: OA	Next Review Date: Nov 2026

Policy Context:	
Related Polices and Documents	Code of Conduct Schedule 3 to Code of Conduct: Workplace Health and Safety Policy Unsatisfactory Performance, Misconduct, Discipline and Termination Policy
Legislation or Other Requirements	<i>Work Health and Safety Act 2011 (Qld)</i> <i>Work Health and Safety Regulation 2011 (Qld)</i>

1. Policy Statement

Beenleigh Steel Fabrications Pty Ltd, BSF Mobile Cranes Pty Ltd and BSF Design Solutions Pty Ltd (the Employer) is looking to ensure a healthy environment for all employees, visitors, and clients. The aim of this policy is to achieve a workplace that is free from tobacco smoke.

Why are we a smoke free workplace?

- There is overwhelming evidence that passive smoking – the breathing in of other people’s tobacco smoke – is harmful to health.
- To comply with our duty of care under Common Law and the Workplace Health and Safety Act (2011) to ensure the health and safety of all workers at work.

To assist us with maintaining a smoke free workplace, smoking will not be permitted on company premises and in company motor vehicles. Prospective employees will be made aware of our smoke-free policy by means of:

- Advertisements for employment will state that this business is a smoke-free workplace.
- New employees will be further advised of the policy during interviews and again when undergoing orientation.

The smoke-free policy will be an integral part of our existing workplace health and safety policies. Any breach of this policy will lead to the normal disciplinary procedures being applied. Any worker who has a grievance relating to this policy should speak to their supervisor.

2. What This Means for Employees

Employees who wish to smoke during working hours may only do so in their scheduled breaks, but not on company property. Those who work in isolation are prohibited from smoking. They are still likely to affect others who come into their area or through the air conditioning system.



State law states that there can be no smoking 'indoors' or a penalty could be imposed. Employees cannot be disciplined because they smoke away from their workplace, during their own time.

Employees must not pollute the environment by leaving cigarette butts on the ground. Littering is an offence and heavy fines apply. Failure to extinguish butts also presents a fire risk. Please dispose of butts in the bins provided.

Workers wishing to quit are encouraged to call the Quit-line 131 848 for advice and support.

RCS Management and RPE Usage Policy		
Version #: 1	Authorised by: AS	Original Issue: Nov 2025
Last Review Date: Nov 2025	Reviewed by: OA	Next Review Date: Nov 2026

Policy Context:	
Related Polices and Documents	Code of Conduct Schedule 3 to Code of Conduct: Workplace Health and Safety Policy Unsatisfactory Performance, Misconduct, Discipline and Termination Policy Environmental Policy PPE Policy
Legislation or Other Requirements	<i>Work Health and Safety Act 2011 (Qld)</i> <i>Work Health and Safety Regulation 2011 (Qld)</i>

1. Policy Statement

Beenleigh Steel Fabrications Pty Ltd, BSF Mobile Cranes Pty Ltd and BSF Design Solutions Pty Ltd (the Employer) is committed to implementing and maintaining compliance with the Respirable Crystalline Silica (RCS) – Construction Work and Manufacturing and Installation of Engineered Stone Products Code of Practice 2023 by WorkSafe Queensland. We will take all necessary steps to prevent or minimize employee exposure to crystalline silica to ensure the health and safety of all employees.

Note this procedure is a guide only and the manufacturer's recommendations supersedes any values and procedures listed.

2. Scope

This policy applies to all employees of the Employer who may be exposed to crystalline silica in the course of their work. This includes employees involved in activities such as cutting, grinding, drilling, and crushing materials that may contain crystalline silica, as well as employees involved in the manufacturing and installation of engineered stone products.

The policy also applies to visitors to the Employer who may be exposed to crystalline silica. Visitors will be made aware of the potential risks associated with crystalline silica and provided with appropriate protective equipment if necessary.

The scope of this policy extends to all of the Employer's premises, including offices, manufacturing facilities, and construction sites. It also applies to all contractors and subcontractors working on behalf of the Employer, who must comply with the requirements of this policy and the new code of practice.

3. Aims & Objectives

The aims and objectives of this policy are:

- To comply with the Respirable Crystalline Silica – Construction Work and Manufacturing and Installation of Engineered Stone Products Code of Practice 2023 introduced by WorkSafe Queensland.
- To prevent or minimize employee exposure to crystalline silica to ensure the health and safety of all employees.
- To provide training and education to employees on the risks associated with exposure to crystalline silica and how to use control measures and protective equipment.
- To maintain records of risk assessments, control measures, and training provided to employees to ensure compliance with the new code of practice.
- To enforce a facial hair policy and proper vacuum cleaner usage to reduce RCS dust exposure.

4. Responsibilities

Compliance with all relevant provisions of the 2023 silica code of practice, including the requirement to conduct a risk assessment to identify tasks that may generate silica dust and the measures required to control employee exposure to silica dust.

- Employees working in tasks that may generate silica dust will be required to wear appropriate personal protective equipment, such as respirators, to protect against inhaling silica dust. However, if engineering controls are sufficient and able to reduce RCS dust to below the limit, face masks and health monitoring may not be necessary. Please refer to the matrix of tasks to determine hazard controls required.
- It is the responsibility of management to monitor the health of employees who may be exposed to crystalline silica through regular medical examinations if required based on risk assessment and exposure levels.
- Necessary implementation of engineering controls, such as water suppression systems, to minimize the generation of silica dust and reduce employee exposure to silica dust.
- All employees working in tasks that may generate silica dust will be provided with training on the health risks associated with silica dust and the measures required to control employee exposure to silica dust. This training will include information on the health effects of silica exposure, how to use control measures and protective equipment, and emergency procedures.
- Records of all risk assessments and control measures implemented to manage employee exposure to silica dust will be maintained.

5. Mandatory Use

When RPE is necessary, it must be used every time there is a risk of exposure. Deliberate failure to use RPE as instructed may result in disciplinary procedures being applied. If RCS exposure is 0.05 mg/m³ or less, averaged over an eight-hour period, then RPE is not required for the task.

6. RPE Care & Maintenance

Respiratory protective equipment (RPE) is an essential tool for protecting workers from harmful airborne contaminants. Proper care and maintenance of RPE is crucial for ensuring

that it continues to function as intended and provides the necessary level of protection. Here are a few best practices for caring for RPE:

- **Storage:** RPE should be stored in a clean, dry place away from direct sunlight and extreme temperatures. It should also be stored in a way that prevents it from becoming damaged or distorted.
- **Inspection:** RPE should be inspected before each use to ensure that it is in good working condition. This includes checking for any signs of damage or wear, such as cracks, tears, or worn straps. If any issues are found, the RPE should be removed from service and replaced. Employees should order replacements through their supervisor as required.
- **Fit testing:** RPE should be fit tested to ensure that it provides an adequate seal and fits properly on the worker's face. This should be done at least annually, or more often if the worker experiences any changes in their facial structure.
- **Training:** Workers should be trained on how to properly use, care for, and maintain their RPE. This should include information on how to properly don and doff the RPE, how to clean and disinfect it, and how to identify and report any issues.
- **Record Keeping:** Keeping records of the fit testing, usage, cleaning, and replacement of RPE can be helpful for ensuring that the equipment is properly maintained and replaced when needed.

By following these best practices, workers can ensure that their RPE is functioning properly and providing the necessary level of protection.

All employees using RPE equipment are to sign for them in the equipment register.

Employees issued with PPE are responsible for the following:

- Using, maintaining, and storing it appropriately; and
- Arranging for the maintenance or laundering of the PPE as required. This can be organised by consultation with your supervisor.

7. Facial Hair Policy Statement

To ensure proper functioning of respiratory protective equipment (RPE), all employees who are required to wear RPE must maintain a clean-shaven face in the areas where the RPE seals to the skin. Facial hair can compromise the seal of RPE, reducing its effectiveness in protecting against RCS dust exposure. Employees who do not adhere to the facial hair policy may be subject to disciplinary actions, as proper RPE use is crucial for employee health and safety.

8. Vacuum Cleaner Use and Maintenance

All vacuum cleaners used for the control of crystalline silica dust must be either H or M class. Employees must ensure that the vacuum cleaner bags are not reused and are disposed of correctly. Vacuum cleaners should not be operated without a bag, as this can lead to uncontrolled release of RCS dust. Employees are responsible for following proper procedures for vacuum cleaner use and maintenance, including regularly checking and replacing bags as needed. Failure to adhere to these requirements may result in disciplinary actions.



By implementing these policy provisions and ensuring employee compliance, the Employer aims to minimise employee exposure to respirable crystalline silica and maintain a safe working environment for all.

UV Protection Policy		
Version #: 1	Authorised by: AS	Original Issue: Nov 2025
Last Review Date: Nov 2025	Reviewed by: OA	Next Review Date: Nov 2026

Policy Context:	
Related Polices and Documents	Code of Conduct Schedule 3 to Code of Conduct: Workplace Health and Safety Policy PPE Policy Environmental Policy
Legislation or Other Requirements	<i>Work Health and Safety Act 2011 (Qld)</i> <i>Work Health and Safety Regulation 2011 (Qld)</i>

1. Rationale

Australia has one of the highest rates of skin cancer in the world. Despite being an almost entirely preventable disease, at least two in every three Australians will develop skin cancer before they reach the age of 70. Of all new cancers diagnosed in Australia each year, 80 per cent are skin cancers.

Workers who work outdoors for all or part of the day have a higher-than-average risk of skin cancer. This is because ultraviolet radiation in sunlight or 'UV' is a known carcinogen. All skin types can be damaged by exposure to UV. Damage is permanent and irreversible and increases with each exposure. Beenleigh Steel Fabrications Pty Ltd, BSF Mobile Cranes Pty Ltd and BSF Design Solutions Pty Ltd (the Employer) has an obligation to provide a working environment that is safe and without risks to health. This obligation includes taking proper steps to reduce the known health risks associated with exposure to UV for outdoor workers.

2. Aims

This policy aims to provide ongoing organisational support to reduce worker exposure to UV by implementing appropriate sun protection control measures.

3. Our commitment

- The Employer will conduct a risk assessment in consultation with health and safety representatives and workers to identify workers who have a high risk of exposure to UV, and work situations where exposure to UV occurs.
- The Employer will reduce workers' exposure to UV by requiring outdoor workers to always use sun protection measures. Everybody else is required to use sun protection when outside during daily sun protection times (when UV Index is 3 and above).
- The Employer recognises that supervision of outdoor workers and monitoring of the use of sun protection measures is required to ensure compliance.
- The Employer recognises that standard company grievance procedures will be initiated where a worker fails to comply with sun protective measures.

- The Employer will ensure injury reporting procedures are followed when an incident of sunburn or excessive exposure to UV occurs in the workplace.
- The Employer recognises that a combination of sun protection measures, which includes engineering and administrative controls and personal protective equipment and clothing, provides the best protection to workers from exposure to UV.

4. Management will ensure:

Engineering controls:

- provide shaded areas or temporary shade where possible.
- encourage workers to move jobs where possible to shaded areas
- consider applying window tinting to work vehicles
- modify reflective surfaces where possible
- identify and minimise contact with photosensitising substances
- provide indoor areas or shaded outdoor areas for rest/meal breaks
- consider shade for all outdoor events
- consider shade in plans for future buildings and grounds

Administrative controls:

- schedule outdoor work tasks to occur when levels of UV are less intense, such as earlier in the morning or later in the afternoon
- schedule indoor/shaded work tasks to occur when levels of UV are strongest, such as the middle part of the day
- rotate workers between indoor/shaded and outdoor tasks to avoid exposing any one individual to UV for long periods of time
- provide daily access to the UV forecast and sun protection times (available from BOM, SunSmart or ARPANSA)
- adopt sun protection practices during all work-related outdoor social events

Personal protective equipment (PPE) and clothing

- To provide outdoor workers with the following PPE, covering as much skin as possible, which must be worn when working outdoors, and be chosen in consultation with workers:
 - long-sleeved shirt with a collar made from material with an ultraviolet protection factor (UPF) of 50+
 - long trousers made from UPF50+ material
 - a sun-protective hat that shades the face, head, ears and neck, is made from UPF50+ material, and is in a broad brimmed, bucket or legionnaire style
 - attachable brims and neck flaps when wearing a hard hat
 - broad-spectrum, water-resistant sunscreen and lip balm with a sun protection factor (SPF) of 30 or higher, that is applied generously 20 minutes before going outdoors so that it can be absorbed, and reapplied at a minimum of every two hours
 - sunscreen and SPF30 lip balm is stored in a cool place (below 30°C to prevent deterioration and reduced effectiveness) (the expiry date on the bottle is checked and adhered to)
 - sunglasses that are close fitting, have wrap-around style and have an eye protection factor of 9 or 10, or meet Australian Standards (AS/NZS 1067) or safety glasses rated “O” (AS/NZS 1337.1)

Education and training

- provide training to workers to educate about the risks of working outdoors and enable them to work safely in the sun
- ensure training is provided as part of induction for new workers
- ensure workers are provided with information to effectively examine their own skin
- inform workers of tax deduction entitlements for sun protective work equipment • promote sun-protective behaviour in prominent areas as a reminder to staff
- ensure managers and supervisors act as positive role models
- adopt sun protection practices during all company social events • promote the use of sun protection measures 'off the job'

5. Workers will:

- co-operate with all measures introduced by management to minimise the risks associated with exposure to solar UV
- comply with instructions and advice in regard to the use of sun protection control measures
- participate in sun protection education programs
- act as positive role models
- be responsible for their own sun-protective practices at work
- report incidents of UV overexposure, including sunburn of the skin and photokeratitis of the eye.

This policy will be reviewed on a regular basis, or at least every three years. Policy changes will be communicated to all staff.

Heat Stress Policy		
Version #: 1	Authorised by: AS	Original Issue: Nov 2025
Last Review Date: Nov 2025	Reviewed by: OA	Next Review Date: Nov 2026

Policy Context:	
Related Polices and Documents	Code of Conduct Schedule 3 to Code of Conduct: Workplace Health and Safety Policy Environmental Policy
Legislation or Other Requirements	<i>Work Health and Safety Act 2011 (Qld)</i> <i>Work Health and Safety Regulation 2011 (Qld)</i>

1 Policy Statement

The purpose of this policy is to provide the necessary information to recognize, assess, and properly control heat stress in the workplace environment and thereby prevent heat stress related injuries and illnesses in the workplace.

2 Scope

This policy describes the associated health effects, heat-related hazards and risk factors, as well as controls for preventing heat stress for Beenleigh Steel Fabrications Pty Ltd's and BSF Mobile Cranes Pty Ltd's (the Employer's) workforce.

3 Minimum Requirements

	Minimum Requirements	
1.	Supervisors are responsible for the following: <ul style="list-style-type: none"> Recognizing the hazards of working in hot environments Mitigating the risk of heat stress by establishing and enforcing engineering controls and appropriate work practices. Watching for signs of heat stress and ensuring that employees interrupt their work with adequate rest periods in an air-conditioned environment. 	
2.	Employees are responsible for monitoring their reaction to workplace conditions and taking basic precautions to prevent heat stress,	
3.	Employees who are at risk for heat stress shall be familiar with the causes, predisposing factors, and symptoms of heat related injuries.	

4 Definitions

Core body temperature - The temperature in the brain, the heart, and the abdominal organs. It changes very little (normal range: 37 degrees Celsius) and is vital for the normal functioning of these organs. The core cannot store an excessive amount of heat without upsetting its delicate temperature balance.

Evaporative cooling - Cooling that takes place when sweat evaporates from the skin. High humidity reduces the rate of evaporation and thus reduces the effectiveness of the body's primary cooling mechanism.

Heat exhaustion - A condition that occurs when the core body temperature rises above normal. It is caused by insufficient fluid intake and exposure to extreme heat for prolonged periods without rest.

Heat stress - The net heat load to which a worker may be exposed from the combined contributions of metabolic cost of work, environmental factors (i.e., temperature, humidity, air movement, and the temperature of surrounding objects [radiant heat exchange]), and clothing requirements. As the body's regulating mechanisms attempt to maintain equilibrium, skin temperature rises, and the activity of the sweat glands increases. Mild or moderate heat stress may cause discomfort and may adversely affect performance and safety, but it is not harmful to health. As the heat stress approaches human tolerance limits, the risk of heat related disorders increase.

Heatstroke - A life-threatening emergency that occurs when the body's thermoregulatory mechanisms fail to function and core body temperature rises above 40 Degree Celsius. The illness has a high mortality rate and is accompanied by hot, dry skin and central nervous system abnormalities such as delirium, convulsions, or coma. Heatstroke can result from exposure to a high environmental temperature as well as strenuous activity in hot, humid conditions. A heatstroke victim may suffer permanent brain injury as well as such complications as kidney, liver, and blood circulation disorders.

5 Roles and Responsibilities

A. *Supervisors are responsible for:*

1. Recognizing the hazards of working in hot environments.
2. Reducing the risk of heat stress by establishing and enforcing controls and appropriate work practices.
3. Providing employees with accurate verbal and written instructions and other information pertaining to the prevention of heat stress.
4. Ensuring that employees manage their work with adequate rest periods and fluid intake.

B. *Workforce members are responsible for:*

1. Being aware of the work environment and control factors that may affect their personal tolerance to heat.
2. Remaining hydrated by drinking fluids frequently.

C. *Safety Advisor is responsible for:*

1. Recommending additional control measures to address heat stress when traditional control measures prove ineffective.

6 Requirements for controlling Heat Stress

When planning work in hot environments, Supervisors shall consider the following administrative precautions to reduce the risk of heat stress related illnesses:

A. *Hydration*

1. Employees shall have access to potable drinking water.
2. Where the supply of water is not plumbed or otherwise continuously supplied, at least one SL container of cold water per employee per shift shall be provided.
3. The frequent drinking of water should be encouraged.

B. *Cooling mechanisms*

1. Employees suffering from heat illness or needing a preventative recovery period shall be provided access to an area with shade (natural shading, tents, tarps, umbrellas, etc.) that is either open to the air or provided with ventilation or cooling for a period of no less than five minutes, or as long as needed to dispel heat overload.
2. Such access to shade shall be permitted at all times. Cooling measures other than shade (e.g., use of misting machines, air-conditioned vehicles, cooling vests, etc.) may be provided in lieu of shade if these measures are at least as effective as shade.

C. *Administrative controls*

1. Supervisors should consider a modified work schedule that allows earlier start times.
2. Supervisors should consider rotating job assignments that will allow different periods of work activity and reduce the heat load.
3. Self-pacing and extra breaks, if needed, shall be encouraged.
4. A buddy system, with emphasis on mutual observation and good communication, shall be encouraged.

7 Prevention

Supervisors shall adopt administrative and engineering controls and work practices that help protect employees from the effects of heat stress by:

1. Monitoring current weather conditions for the effects of humidity on perceived temperature and discuss this at daily pre-start.
2. Setting up a work-rest cycle.
3. Providing an adjustment or acclimation period for new employees.

8 Treatment

8.1 Heatstroke

Heatstroke is a medical emergency requiring immediate attention. On the job, collapse from heatstroke is often mistaken for heart attack or head injury. It is considered a catastrophic illness and has a high death rate. Outwardly, it may first progress through the symptoms of heat cramps and/or heat exhaustion, with a dramatically sudden onset of heatstroke symptoms followed by rapid deterioration of the victim's condition.

Personnel administering first aid for heatstroke should observe the following procedures:

1. Call for emergency medical assistance immediately. Heatstroke can be fatal.
2. Move the victim from the hot environment to a shady or air-conditioned location.
3. Put the victim in a reclining position and elevate the legs and feet slightly.
4. Gently remove the outer clothing, exposing as much skin as possible
5. Start the cooling process without delay. Apply cool water to the victim's skin, followed by fanning to produce evaporative cooling. Apply ice packs to the armpits, neck, and groin. Do not immerse the victim in an ice bath.
6. Administer cool fluids if the victim can safely swallow. Do not give aspirin to reduce body temperature.

8.2 Heat Exhaustion

Heat exhaustion is serious because it carries a high risk of progressing to heatstroke. A. Personnel administering first aid for heat exhaustion should observe the following procedures:

1. Move the victim from the hot environment to a shady or air-conditioned location.
2. To prevent fainting, put the victim in a reclining position and elevate the legs and feet slightly.
3. Loosen or remove clothing.
4. Give the victim cool (not ice-cold) water or an electrolyte replacement drink.
5. Cool the victim by sponging the skin with cool water and fanning.
6. Stay with the victim until medical help arrives. Monitor their condition until there is no danger of heatstroke, which often develops quickly from heat exhaustion.
7. Do not allow the employee to operate machinery or perform strenuous activities until he or she has been examined by a qualified medical professional.

8.3 Heat Cramps

Personnel administering first aid for heat cramps should observe the following procedures:

1. Move the victim into the shade.
2. Loosen clothing.
3. Administer lightly salted liquids. Make a 0.1% saline solution by adding 1/4 teaspoon table salt to one quart of water.
4. Massage the muscles.
5. Have the victim seek medical aid if the cramps persist.

9 Summary

As a practical guideline, the following measures can be followed in most workplaces: When temperatures are expected to be greater than 30 degrees it is recommended that workers work an eight-hour day.

Temperature	Rest Period
30 to 32 Degrees	10 Minutes
32 to 35 Degrees	15 Minutes
More than 35 Degrees	At least 30 Minutes

Mobile Adflow Welding Helmet Policy		
Version #: 1	Authorised by: AS	Original Issue: Nov 2025
Last Review Date: Nov 2025	Reviewed by: OA	Next Review Date: Nov 2026

Policy Context:	
Related Polices and Documents	Code of Conduct Schedule 3 to Code of Conduct: Workplace Health and Safety Policy Unsatisfactory Performance, Misconduct, Discipline and Termination Policy
Legislation or Other Requirements	<i>Work Health and Safety Act 2011 (Qld)</i> <i>Work Health and Safety Regulation 2011 (Qld)</i>

1. Policy Statement

Beenleigh Steel Fabrications Pty Ltd, BSF Mobile Cranes Pty Ltd and BSF Design Solutions Pty Ltd (the Employer) is committed to achieving and maintaining a safe working environment on all their work sites. The purpose of this policy is to provide guidance to all welders in relation to adflow helmet respiratory equipment. The policy is limited directly to employees of the Employer. Contractors are responsible for providing PPE to their own employees.

Adflow welding respiratory equipment will be provided as a control measure where it is not practicable to eliminate or control the hazard effectively, or as an additional protective measure. Upon request, all workshop welders will be allocated an Adflow welding helmet after a period of 1 week from the start of employment, pending their passing of welding examination.

Site boilermakers will be allocated an adflow welding helmet on a project specific needs basis pending their passing of welding examination, where welding exceeds the 8-hour TWA. Boilermakers completing set out or occasional welding will not be issued an adflow welding helmet.

The adflow welding helmet will be allocated using the Adflow Helmet Allocation Form'.

2. Responsibilities

- All issued respiratory equipment shall comply with the appropriate Australian Standards
- Management will ensure that all respiratory equipment is issued with instructions for use, maintenance, and storage
- All welders are responsible for using respiratory equipment during all welding tasks
- Supervisors are responsible for ensuring that employees are adequately fitted with the respiratory equipment and trained in its use
- Supervisors are responsible for ensuring that adequate storage for respiratory equipment is provided for when equipment is not in use

3. Mandatory Use

Respiratory equipment must be used by welders during all continuous welding tasks/activities, where the welder will exceed the 8-hour TWA for the wire being used. Welders must keep of log of time spent welding so that their TWA can be assessed. Where required, deliberate failure to use respiratory equipment as instructed may result in disciplinary procedures being applied.

4. Training

Training for employees who use respiratory equipment shall include:

- An explanation of the risk present and why respiratory equipment is needed
- How and when to use respiratory equipment
- How to inspect and maintain respiratory equipment; and
- Cleaning and storage requirements

5. Maintenance

Employees issued with respiratory equipment are responsible for the following:

- Using, maintaining, and storing it appropriately
- Arranging for the maintenance or laundering of the respiratory equipment as required. This can be organised by consultation with your supervisor
- Ensuring that helmets are kept hygienic and cleaned on a regular basis
- Changing air filters, lenses and other parts as required and in line with manufacturer requirements/user instructions

6. Replacement

Employees must regularly inspect their respiratory equipment for normal wear and tear, and for specific damage which may adversely affect the equipment's effectiveness. Employees should order replacements/consumables through their supervisor as required.

Mobile Phone Policy		
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Last Review Date: Nov 2025	Reviewed by: OA	Next Review Date: Nov 2026

Policy Context:	
Related Polices and Documents	Code of Conduct Schedule 3 to Code of Conduct: Workplace Health and Safety Policy Unsatisfactory Performance, Misconduct, Discipline and Termination Policy
Legislation or Other Requirements	<i>Work Health and Safety Act 2011 (Qld)</i> <i>Work Health and Safety Regulation 2011 (Qld)</i>

1 Policy Statement

It is the policy of Beenleigh Steel Fabrications Pty Ltd, BSF Mobile Cranes Pty Ltd and BSF Design Solutions Pty Ltd (the Employer) to observe and control the mandatory requirements in respect of the use of mobile phones at the workplace.

The Employer will manage the use of mobile phones by their employees, contractors, and sub-contractors to reduce safety risks.

Mobile phones offer many benefits, but they can be a distraction when carrying out safety-critical tasks such as driving a motor vehicle or operating plant and equipment. These activities require your full attention, and therefore it is essential that people involved in these activities provide this level of attention without distractions.

2 Mobile Safety

Mobile phones must not be used in the Workshop. Employees may divert their phone to the Employer's front office during normal working hours in cases of emergency. The front office phone number is 07 3440 1500.

As added precautions:

- When making or receiving calls do not walk around as this can lead to a lack of awareness of the surrounding area.
- If you are calling a mobile phone, always ask if it is safe for the other person to talk and offer to call back if it is not.
- Always switch off your mobile phone if there is a known risk of an explosive atmosphere such as when refuelling motor vehicles, plant, or equipment
- Be aware of the health risks posed by mobile phones and take steps to minimise these risks, such as using headphones during long conversations and not holding the handset too close to your ear.

3 While Driving Motor Vehicles

Not only is it unsafe and dangerous, but it is also illegal to use a mobile phone while in control of a vehicle, therefore:

- The driver must not use a handheld mobile phone whilst driving.
- The use of a “Hands Free” speaker phone should be kept to a minimum - P1 & P2 Licence holders must visit: <https://www.qld.gov.au/transport/safety/road-safety/mobile-phones> for additional information regarding “Hands Free”
- Drivers must stop the vehicle in a safe place before making a call.
- Drivers should ask passengers to switch off their mobile phones if they are causing a distraction.

4 While Operating Plant & Equipment

Mobile Phones must be switched off when operating plant such as cranes, forklifts, and elevated work platforms.

- Mobile Phones must not to be used when involved in activities that include the use of cranes and EWPs.
- Do not use your phone when working with equipment such as generators or compressors.

NB: The use of a mobile phone while operating plant/equipment or driving a company motor vehicle will be classed as a Safety Breach and will result in a written warning being issued to the individual. Further Safety Breaches may result in termination of employment.

5 While Conducting High-Risk Activities

Mobile phones must be switched off while conducting high-risk activities as they take your attention from the task at hand. To eliminate the need for mobile phones you should:

- Establish an effective means of communication such as whistles, radios and hand signals.
- Test communication methods to ensure they are working.
- Discuss the task before commencing so that all personnel are aware of what is going on and who is responsible for what tasks.

Laptop Usage Policy		
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Policy Context:	
Related Polices and Documents	Code of Conduct Schedule 3 to Code of Conduct: Workplace Health and Safety Policy Unsatisfactory Performance, Misconduct, Discipline and Termination Policy
Legislation or Other Requirements	<i>Work Health and Safety Act 2011 (Qld)</i> <i>Work Health and Safety Regulation 2011 (Qld)</i>

1. Policy Statement

This policy document sets out the guidelines for the proper usage of Beenleigh Steel Fabrications Pty Ltd's and BSF Mobile Cranes Pty Ltd's (the Employer's) owned and issued laptops. The safety of all staff is of utmost importance to the Employer, and we are at the forefront of development of initiatives to ensure the safety of all employees.

2. Conditions of Use

Use of laptops is to be consistent with the Employer's business operations and organisational objectives only. The following conditions of use apply:

- Laptops will be issued as a tool of your trade, not for personal use; monitoring software is installed on devices.
- At all times, the Employer-issued laptops shall remain the property of the Employer and is subject to this tablet usage policy.
- The organization reserves the right to require the return of a laptop at any time for any reason. If the return of a laptop is requested, it must be returned within 24 hours of the request being made.
- Employees issued with a laptop are expected to understand the conditions of use, exercise the same care and security considerations of the laptop as if it were their own property.
- Laptops must not be left unattended in an unsecure location.
- If left in a motor vehicle, the vehicle must be locked, and the device must not be visible through any windows.
- Malfunctions /technical issues/theft or any damage of laptops and accessories must be reported immediately to the project manager.
- Lending a laptop to any third party is strictly prohibited.
- Careless and negligent loss, damage, or misuse of a laptop, or any accessory, could result in the Employer taking cost recovery and/or disciplinary action.

Tablet Usage Policy		
Version #: 1	Authorised by: AS	Original Issue: Nov 2025
Last Review Date: Nov 2026	Reviewed by: OA	Next Review Date: Nov 2026

Policy Context:	
Related Polices and Documents	Code of Conduct Schedule 3 to Code of Conduct: Workplace Health and Safety Policy Unsatisfactory Performance, Misconduct, Discipline and Termination Policy
Legislation or Other Requirements	<i>Work Health and Safety Act 2011 (Qld)</i> <i>Work Health and Safety Regulation 2011 (Qld)</i>

1. Policy Statement

This policy document sets out the guidelines for the proper usage of Beenleigh Steel Fabrications Pty Ltd's and BSF Mobile Cranes Pty Ltd's (the Employer's) owned and issued tablets. The safety of all staff is of utmost importance to the Employer, and we are at the forefront of development of initiatives to ensure the safety of all employees.

New technologies give the Employer the ability to supply the most up to date and relevant information to our employees and removes or reduces the risks to the health, safety, and welfare of all workers.

2. Conditions of Use

Use of tablets is to be consistent with the Employer's business operations and organisational objectives only. The following conditions of use apply:

- Tablets will be issued as a tool of your trade, not for personal use; monitoring software is installed on devices.
- At all times, the Employer-issued tablet shall remain the property of the Employer and is subject to this tablet usage policy.
- The organisation reserves the right to require the return of a tablet at any time for any reason. If the return of a tablet is requested, it must be returned within 24 hours of the request being made.
- Employees issued with a tablet are expected to understand the conditions of use, exercise the same care and security considerations of the tablet as if it were their own property.
- Tablets must not be left unattended in an unsecure location.
- If left in a motor vehicle, the vehicle must be locked, and the device must not be visible through any windows.
- Malfunctions /technical issues/theft or any damage of tablets and accessories must be reported immediately to the project manager.
- Lending a tablet to any third party is strictly prohibited.
- Careless and negligent loss, damage, or misuse of a tablet, or any accessory, could result in the Employer taking cost recovery and/or disciplinary action.
- Tablets must be charged prior to the day's activities.
- There is to be no changing of any setting without management's approval; any suggestions will be considered by management.

Use of Company Vehicles & Plant Policy		
Version #: 1	Authorised by: AS	Original Issue: Nov 2025
Last Review Date: Nov 2025	Reviewed by: OA	Next Review Date: Nov 2026

Policy Context:	
Related Polices and Documents	Code of Conduct Schedule 3 to Code of Conduct: Workplace Health and Safety Policy Unsatisfactory Performance, Misconduct, Discipline and Termination Policy
Legislation or Other Requirements	<i>Work Health and Safety Act 2011 (Qld)</i> <i>Work Health and Safety Regulation 2011 (Qld)</i>

1. Policy Statement

All motor vehicles & plant will remain at all times, the legal property of Beenleigh Steel Fabrications Pty Ltd, BSF Mobile Cranes Pty Ltd and BSF Design Solutions Pty Ltd (the Employer). Employees are urged to take the utmost care and caution while in control of any company vehicles or plant.

All employees that are granted the opportunity to operate any of the Employer's vehicles, plant or equipment are always obliged to use them in a safe and responsible manner.

2. Responsibilities

Employees are granted use of a company motor vehicle solely for work purposes, and in the course of their employment may be asked to return the vehicle and/or plant keys for any of the following reasons:

- If the employee does not keep their use of company vehicles for private purposes to a minimum.
- If the employee intends to take annual leave or extended sick leave.
- If the vehicle or plant is temporarily required for another use.
- To reduce the effects on the environment through the excessive use of vehicles and plant, fuel expenditure and mileage on all vehicles is closely monitored by the directors and any abuse of this provision will be pursued by them.
- The employee must have a current licence to operate the relevant class of vehicle or plant and employee shall provide the company with a copy of any licence upon renewal.
- The employee must notify management in the event of cancellation or suspension of their driver's licence and/ or plant operator's certificate of competency. NB: failure to notify management of any change or cancellation will result in disciplinary action.
- All due care must be taken to ensure the safety of yourself, the vehicle or plant you are driving and other vehicles, plant, people, and property.

- The employee must always operate the vehicle and plant in a safe and courteous manner and observe road rules and site rules.
- Drive responsibly to road and weather conditions and 'if its flooded forget it'.
- Keep the company vehicle/plant clean and tidy, clean mud from boots before entering the vehicle, remove any litter and dispose of by the end of the shift.
- Drivers are responsible for equipment in respective vehicles at all times. Keep trays in utes, prime movers/fixed bed trailers free from debris and the equipment secure. Care must be taken of all equipment, which is to be accounted for and returned to its correct location for storage after use.
- Personnel operating vehicles or plant must undertake routine checks to ensure it complies with State road or job site requirement prior to operation. Any damage or faults must be rectified immediately or management notified to organise rectification works. Vehicle or plant must not be operated in an unfit state which may cause further damage or injury to persons.
- The driver must be free of the effects of alcohol, drugs and chemical substances whilst operating the vehicle or plant. If taking pharmacy medication which may affect ability to operate the vehicle or plant, a supervisor must be informed at the beginning of the workday or shift. Failure to comply with these provisions could have an impact on continued employment with the company.
- This company has in force a SMOKE FREE WORKPLACE POLICY. The Employer has an obligation under the Workplace Health and Safety Act to provide a smoke free work environment for all our Employees and we will enforce this to the letter of the law. This includes ALL company owned or hired vehicles and plant. Anyone caught smoking in our vehicles will receive an official written warning and repeat offenders may have their employment terminated.
- The employee must notify management in the event of a traffic violation or accident or incident involving the vehicle or plant.
- The employee must not willfully place at risk the health and safety of any person at the Workplace. (e.g., using a mobile phone while operating a motor vehicle or item of plant).

If involved in a vehicle accident, while at the scene of the accident:

- DO NOT ADMIT LIABILITY – ADMISSION OF LIABILITY MAY VOID INSURANCE.
- Comply with police reporting requirements.

If another vehicle is involved, obtain:

- The owner's name, address and telephone number.
- The driver's name, address and Driver's Licence number.
- The name of the owner's insurance company.
- The make, type and registration number of the vehicle.
- The name, address and telephone numbers of any witnesses.

3. Plant & Machinery Requirements

The Employer must ensure that all mobile plant is fitted with required safety features, which may include:

- Roll-overprotective structures (ROPS) or falling object protective structures (FOPS) (if required by

manufacturer).

- Guards to prevent contact with moving parts and components.
- Protection from noise and ultraviolet radiation exposure, and
- Other measures for operator health and safety (e.g., safe access, seat belts).

Persons who operate items of mobile plant must be holders of the appropriate licence or National Certificate of Competency Card or be trainees under the instruction of a competent person. Persons operating plant in rough terrain or on unmade tracks, etc, must be familiar with the special techniques required to operate the plant in abnormal conditions, and will not be allowed to undertake operating in hazardous conditions unless assessed as competent to do so.

Appropriate pre-start checks should be made of mobile plant and machinery and include checks of fluids (oil, coolant, fuel, hydraulics, etc, including checks for leaks), tyres (condition, correct inflation), electrics (lights, horn, reversing beeper, etc), and operation (steering, brakes, etc). Repairs should only be carried out by authorised persons.

Where required, the logbook for the plant should be completed as specified to provide details of hours operated, fuel or other consumables, and service and maintenance details.

Transport & Heavy Haulage Policy		
Version #: 1	Authorised by: AS	Original Issue: Nov 2025
Last Review Date: Nov 2025	Reviewed by: OA	Next Review Date: Nov 2026

Policy Context:	
Related Polices and Documents	Code of Conduct Schedule 3 to Code of Conduct: Workplace Health and Safety Policy Unsatisfactory Performance, Misconduct, Discipline and Termination Policy
Legislation or Other Requirements	<i>Work Health and Safety Act 2011 (Qld)</i> <i>Work Health and Safety Regulation 2011 (Qld)</i>

1. Policy Statement

Beenleigh Steel Fabrications Pty Ltd, BSF Mobile Cranes Pty Ltd and BSF Design Solutions Pty Ltd (the Employer), in keeping with our commitment to eliminate and minimise risks to workers and the public, will do everything that is reasonably practicable to ensure transport-related operations and activities carried out by the company are safe and without risks to any person.

As a party in the chain of responsibility, we commit to do all that is reasonably practicable to identify, assess and remove any public risk, and work to ensure that the operations and activities of all persons in the supply chain who have influence on how goods are delivered or received by heavy vehicle are carried out in accordance with all relevant chain of responsibility (CoR) and WHS laws so far as is reasonably practicable.

2. Purpose

The purpose of this policy is to outline the Employer’s commitment to the effective management of transport and heavy haulage specifically relating to the following:

- Chain of Responsibility
- Fatigue Management
- Load Restraint
- Obeying Road Rules
- Road Restrictions Including Bridges & Culverts

3. Responsibilities

The Employer understands that parties in the supply chain under the Heavy Vehicle National Regulation have an obligation to ensure breaches of road transport laws do not occur. Duty holders need to make sure that their action or inaction does not contribute to or encourage breaches of the HVNL. If a party’s actions, inactions or demands cause or contribute to an

offence, they can be held legally accountable. All records are to be kept for a minimum of 3 years.

All Injuries, incidents and near misses must be reported and managed as outlined in the BSF Safety Management Plan. All Non-conformances must be reported and managed as outlined in the Employer's QA Manual.

3.1. Manager & Scheduler Responsibilities

As a manager or scheduler involved in road transport, your responsibilities also include ensuring that:

- Ensuring drivers are provided with valid and appropriate documents required to operate the heavy vehicle in compliance with the national law, any accreditation or other legal instrument (for example, a notice or permit)
- Ensuring drivers understand their responsibilities regarding the operation of the vehicle in accordance with the documentation and other relevant requirements.
- Ensuring drivers are provided with an appropriate electronic device (if required) that will allow an authorised officer to read and understand all elements of any document presented without the authorised officer having to enter the vehicle.
- Planning routes to ensuring compliance with NHVL and relaying this information to drivers
- Holding a licence register internally and conduct licence audits of all drivers on a periodic basis
- Rosters and schedules do not require drivers to exceed driving hours, regulations, or speed limits
- Records are kept of your drivers' activities, including work and rest times
- All reasonable steps are taken to ensure drivers do not work while impaired by fatigue or drive in breach of their work or rest options
 - Collect records
 - Audit records
 - Record and manage Breaches
- Vehicles are regularly maintained, and if speed limiters are fitted, they are functioning properly
- Vehicles are not loaded in a way which exceeds mass or dimension limits (excluding approved oversized loads)
- Drivers moving freight containers have a valid container weight declaration
- Loads are restrained with appropriate restraint equipment and techniques

3.2. Driver Responsibilities

The responsibilities of drivers include:

- Ensuring that drivers understand their personal responsibilities regarding the operation of the vehicle in accordance with the documentation and other relevant requirements
- Comply with state and territory road rules
- Hold a current and valid driver license issued in the state or territory of residence of the driver for any vehicle they may operate

- Advising management immediately if any points are accumulated or the loss of the entire license due to suspension or disqualification, and the reason why
- Following all requirements of this policy, as well as other internal policies and procedures
- Always carry their licence on them and produce immediately upon request to a state authority of police officer

3.3. Consignor/Consignee Responsibilities

As consignor or consignee your responsibilities include ensuring that:

- Loads do not exceed vehicle mass or dimension limits
- Goods carried on your behalf can be appropriately secured
- Operators carrying freight containers have a valid container weight declaration
- Delivery requirements do not require or encourage drivers to:
 - Exceed the speed limits - - -
 - Exceed regulated driving hours
 - Fail to meet the minimum rest requirements
 - Drive while impaired by fatigue

3.4. Loading Manager/Loader/Packer Responsibilities

Loading managers, loaders and packers must ensure that loading a fatigue-regulated heavy vehicle will not cause or contribute to the driver driving while impaired by fatigue or in contravention of road transport laws.

Loading manager responsibilities include:

- Working with other off-road parties to make reasonable arrangements to manage loading/unloading time slots
- Ensuring vehicles are loaded/unloaded as quickly and efficiently as possible
- Putting systems in place for unexpected jobs – for example where there have been unexpected road delays.

Loader responsibilities include ensuring a vehicle's load:

- Does not exceed dimension limits (excluding approved oversized loads)
- Does not cause the vehicle to exceed mass limits
- Is placed in a way so it does not become unstable, move, or fall off the vehicle
- Documentation about the vehicle's load is not false or misleading

4. Bridge & Culvert Restrictions

When planning routes and allocating vehicles, the Employer will plan routes to ensuring compliance with NHVL using interactive mapping and relay this information to drivers. All drivers will also have access to and utilise interactive mapping to ensure they comply with NHVL.

5. Fatigue Management

The Employer follows Heavy Vehicle National Law Regulation, where all drivers of fatigue regulated heavy vehicles;

- who drive within 100km of their base must carry and complete a daily trip sheet to record their work and rest times and provide them to management daily.
- who drive outside of 100km of their base must carry and complete a work diary carbon copy book and provide them to management weekly.

In addition to the general duty to not drive a fatigue-regulated heavy vehicle on a road while fatigued, drivers must comply with certain maximum work and minimum rest limits.

Parties in the supply chain must take all reasonable steps to prevent the drivers from exceeding these limits. This is like occupational health and safety laws and means that drivers must be allowed to stop if they are at risk of exceeding the limits and make alternative arrangements.

Any Breaches to the fatigue management must be recorded as a Safety Breach and investigated.

5.1. Solo Drivers – Standard Working Hours

Work and rest hour requirements under standard hours. Standard hours apply to all drivers who do not have accreditation for fatigue management. The Heavy Vehicle National Law (HVNL) requirements for work and rest periods are as follows:

Time	Work	Rest
In any period of:	A driver must not work for more than a maximum of:	And must have the rest of that period off work with at least a minimum rest break of:
5 ¼ Hours	5 ¼ hours work time	15 continuous minutes rest time
8 Hours	7 ½ hours work time	30 minutes rest time in blocks of 15 continuous minutes
11 Hours	10 hours work time	60 minutes rest time in blocks of 15 continuous minutes
24 Hours	12 hours work time	7 continuous hours stationary rest time
7 Days	72 hours work time	24 continuous hours stationary rest time
14 Days	144 hours work time	2 x night rest breaks and 2 x night rest breaks taken on consecutive days

**Stationary rest time is the time a driver spends out of a heavy vehicle or in an approved sleeper berth of a stationary heavy vehicle.*

***Night rest*

breaks are 7 continuous hours stationary rest time taken between the hours of 10pm on a day and 8am on the next day (using the time zone of the base of the driver) or a 24 continuous hours stationary rest break.

5.2. Solo Drivers – Basic Fatigue Management

Operators with Basic Fatigue Management (BFM) accreditation can operate under more flexible work and rest hours, allowing for (among other things) work of up to 14 hours in a 24-hour period. The Heavy Vehicle National Law (HVNL) requirements for work and rest periods are as follows:

Time	Work	Rest
In any period of:	A driver must not work for more than a maximum of:	And must have the rest of that period off work with at least a minimum rest break of:
6 ¼ Hours	6 hours work time	15 continuous minutes rest time
9 Hours	8 ½ hours work time	30 minutes rest time in blocks of 15 continuous minutes
12 Hours	11 hours work time	60 minutes rest time in blocks of 15 continuous minutes
24 Hours	14 hours work time	7 continuous hours stationary rest time
7 Days	36 hours long/night work time	No limit has been set
14 Days	144 hours work time	24 continuous hours stationary rest time taken after no more than 84 hours work time and 24 continuous hours stationary rest time and 2 x night rest breaks [#] and 2 x night rest breaks taken on consecutive days.

**Stationary rest time is the time a driver spends out of a regulated heavy vehicle or in an approved sleeper berth of a stationary regulated heavy vehicle.*

***Long/night work time is any work time (outside of the period midnight to 6.00 am) that is in excess of 12 hours of work in a 24-hour period or any work time between midnight and 6 am (or the equivalent hours in the time zone of the base of a driver).*

#Night rest breaks are 7 continuous hours stationary rest time taken between the hours of 10pm on a day and 8am on the next day (using the time zone of the base of the driver) or a 24 continuous hours stationary rest break.

6. Load Restraint

The Employer values the importance of effective load restraint due to the nature of work undertaken, items fabricated, and loads transported. The Employer ensures its legal compliance by following the National Heavy Vehicle Law (NHVL) in all regards of transportation including load restraint.

All drivers will be provided with a load restraint guide form the National Heavy Vehicle Regulator to help assist them with determining effective methods of load restraint. Along with a load restraint guide, years of experience and knowledge, all drivers will be assessed to verify their competency to restrain a load.

6.1. Loading Requirements

For the Employer, a load on a heavy vehicle must:

- Not be placed in a way that makes the vehicle unstable or unsafe
- Be secured so it is unlikely to fall or be dislodged from the vehicle
- Be restrained: -
 - Using an appropriate method of restraint -
 - In a way that meets the loading performance standards contained in the Heavy Vehicle (Mass, Dimension and Loading) National Regulation (Regulation)

6.2. The Importance of Loading Requirements

Poorly loaded or inadequately restrained loads may cause injuries and fatalities when:

- Heavy objects fall from vehicles onto other vehicles or pedestrians

- Drivers swerve to avoid falling or fallen items from vehicles
- Spillage on roads from vehicles causes other vehicles to skid and lose control
- Unrestrained loads crash into vehicle cabins during emergency braking
- Vehicles overturn when loads shift during cornering.

6.3. Driver Responsibilities

Before starting and throughout a journey, drivers must ensure that they:

- Do not drive on a road when the heavy vehicle or its load does not comply with the loading requirements for that vehicle
- Carry out periodic checks to ensure the load has not shifted and is still secure.
- Check the load is secured and tied down effectively

The Employer is committed to the continuous improvement of its policies, procedures, and workforce, therefore, will regularly monitor and review this policy. The Employer will also regularly review its worker knowledge, skill and overall competency to follow National Heavy Vehicle Regulations.

All employees of the Employer are required to follow all requirements of this policy, as well as other internal policies and procedures. This policy is written as a guide to show commitment to following the National Heavy Vehicle Regulations. All transport and heavy haulage activities will be conducted in accordance with relevant regulations.

7. Obeying Road Rules

All drivers are to comply with state or territory road rules.

7.1. Defect Notice

If a defect notice is issued by the relevant authority the Construction Manager must be notified immediately. The rectification and subsequent proof of compliance will be managed and issued by the Construction Manager. Preventive measures will be devised and implemented.

7.2. Speed Management

Posted speed limits must be adhered too and speed limiters are not to be tampered with. Malfunctioning speed limiters are to be reported to management immediately.

Exceeding the speed limit more than 25km/h resulting in a traffic offence can result in an immediate termination of employment/contract.

Exceeding the speed limit not more than 25km/h resulting in a traffic offence will be subject to A three-strike system:

- Strike one equates to retraining and first warning,
- Strike two equates to retraining, formal written warning, possible suspension.
- Strike three equates to termination of employment/contract, notice to show cause for retention of employment/ contract.



Reports of speeding/reckless driving/etc by the public will also be recorded and will be considered when assessing driver performance and their employment.

Employee Relations Management Policy		
Version #: 1	Authorised by: AS	Original Issue: Nov 2025
Last Review Date: Nov 2025	Reviewed by: OA	Next Review Date: Nov 2026

Policy Context:	
Related Polices and Documents	Code of Conduct Schedule 1 to Code of Conduct: Drug and Alcohol Policy Schedule 2 to Code of Conduct: Bullying, Harassment and Anti-Discrimination Policy Schedule 3 to Code of Conduct: Workplace Health and Safety Policy Employee Complaints, Disputes and Grievances Policy. Workplace Rehabilitation Policy Company Policy Equal Opportunity Policy Mobile Phone Policy Adflow Welding Helmet Policy Environmental Policy PPE Policy Smoke Free Workplace Policy Transport and Heavy Haulage Policy Use of Company Vehicles Policy Young Worker Policy
Legislation or Other Requirements	<i>Fair Work Act 2009 (Cth)</i> <i>Fair Work Regulations 2009 (Cth)</i> <i>Work Health and Safety Act 2011 (Qld)</i> <i>Work Health and Safety Regulation 2011 (Qld)</i> <i>Superannuation Guarantee (Administration) Act 1992 (Cth)</i> <i>Anti-Discrimination Act 1991 (Qld)</i> <i>Human Rights Act 2019 (Qld)</i> <i>Age Discrimination Act 2004 (Cth)</i> <i>Australian Human Rights Commission Act 1986 (Cth)</i> <i>Disability Discrimination Act 1992 (Cth)</i> <i>Racial Discrimination Act 1975 (Cth)</i> <i>Sex Discrimination Act 1984 (Cth)</i>

1. Policy Statement

The purpose of this policy is to ensure that the employees, contractors, and clients of Beenleigh Steel Fabrications Pty Ltd, BSF Mobile Cranes Pty Ltd and BSF Design Solutions Pty Ltd (the Employer) are aware of the Employer's strategy for identifying industrial relations risks, including the assessment and management of such risks.

This policy also shows the Employer's commitment to managing relationships with stakeholders to achieve standards and behaviours that meet or exceed our obligations under

legislation including the *Fair Work Act 2009* (Cth) and *Workplace Health and Safety Act 2011* (Qld).

2. Scope

This Management Plan applies to:

- Employees
- Contractors / Subcontractors performing work for the Employer
- Principal Contractors

This Employee Relations Management Policy (ERMP) is integral to the Employer's overall business development plan and key features of this overall policy include:

- The Employer provides facilities (where applicable) that will significantly improve the productivity of Australian industry, and which are provided at licence rates that are competitive with comparable facilities worldwide
- Employment terms that complement these advantages
- The Employer, employees and their Unions will promote a harmonious workplace based on openness, transparency, and timely negotiations with all parties promoting adherence to the state's objectives and to have effective dispute resolution procedures
- The Employer must be able to effectively coordinate the activities of different companies working concurrently and that efforts are focussed towards 'the greater good'
- This Employee Relations Management Policy aims to encourage employment terms that enhance overall productivity and cost competitiveness
- Promote stability, openness between parties and confidence in the industrial relations environment at the AMC-CUF; and

As the Employer promotes an industrial relations environment based on fairness and equity and states its preference that work should be based on Queensland State Industrial agreements as a minimum.

3. Objectives

The Employer's objective is to provide equitable rights and responsibilities for all of the Employer's employees; preventing and eliminating discrimination in employment providing for effective, responsive, and accessible support for negotiations; and resolution of industrial disputes.

4. Implementation

The implementation of this Employee Relations Management Plan will be managed as per the roles and responsibilities listed in the below table:

4.1. Roles & Responsibilities

Responsibility	Job Role
Accountability for the overall management of workplace relations (Site)	Project Manager
Accountability for the overall management of workplace relations (Workshop)	Construction Manager
Overall authority over matters affecting the construction and delivery of a project	Project Manager
Implementing this Employee Relations Management Plan	Director
Ensuring compliant procurement practices	Director
Monitoring responsibilities defined within this ERMP	Director
Seeking advice and/or support as required from external sources i.e. workplace relations advice	Director
Continual monitoring of performance to ensure ongoing compliance with this ERMP	Project Manager
Establishing and maintaining effective communication between BSF and a project	Site Manager
Managing the reporting/notification of potential and/or actual compliance issues	Project Manager
Monitoring and delivering labour productivity	Site Manager
Grievance/Dispute management processes	Site Manager
Advising any potential/actual industrial dispute/issue to project management	Site Manager

4.2. Best Practices

The Employer is committed to applying best practice related to workplace health and safety, apprentices, and trainees, industrial relations, compliance with procurement, tendering, and other government policies. To achieve best practice, the Employer will:

- Engage a third-party certification body to conduct audits and certify the Employer to ISO 45001 – OHS Management Systems and ISO 9001 – Quality Management Systems (refer to PP.009 – Health & Safety Policy and PP.027 – Quality Policy)
- Achieve ASI Environmental Sustainability Charter Member in collaboration with the Green Building Council of Australia (Green Star) (refer to PP.005 – Environmental Policy)
- Agree with certified Enterprise Bargaining Agreements (EBA), which have been endorsed by relevant trade unions and are Fair Work Commission approved
- Trainees and apprentices learn from our operations and experience, making them valuable members of the community and our workplace. Our trainees and apprentices are of various ages and backgrounds and include Indigenous personnel (refer to Equal Opportunity Policy for further information).

The Employer's legacy is an impressive and varied body of work: from stadiums, bridges and hospitals to army barracks, multi-level carparks and rail stations. Please refer to our website, www.beenleighsteel.com.au which details some of the landmark structures we have fabricated and erected over the years - often to critical acclaim. Our portfolio highlights our reliability and versatility in successful project delivery, cementing our reputation as steel specialists and experts in every facet of our service catalogue.

Our experience demonstrates our ability to comply with tendering, procurement, project management and governmental policies (refer to Company Policy for further information).

The Employer enjoys a good track record in Industrial Relations for both direct employees and for Subcontractors. As a basis for good Industrial Relations Management, the following procedures are utilised:

- Good Relationships with the Trade Unions

- Enterprise Bargaining Agreements
- Regular Meetings between Management & Workplace Consultative Committee
- Monthly Safety Management Meetings
- Regular Safety Training Meetings

The Employer promotes and strives to achieve best practice by:

- Complying with the applicable National Code of Practice for the Construction Industry – best practice guidelines
- Adopting a co-operative, non-adversarial approach in all dealings and relationships
- Constantly improving skills, planning and efficiency
- Maintaining high standards in OHS & Environmental Management

5. Performance Management

Supervisors/Site Managers have the responsibility to manage the performance, behaviour and conduct of our employees. Managing poor performance, inappropriate behaviour or serious misconduct shall be addressed as soon as an issue is identified.

The Employer expects all employees to:

- Treat other people with respect and dignity and in a way that they themselves would want to be treated
- Treat all property with appropriate care as if it were their own
- Perform work to the standard as directed

For matters involving poor performance, inappropriate behaviour or serious misconduct, disciplinary procedures and actions will be consistent with the principles of procedural fairness.

6. Workplace Relations Risk Management

6.1. Risks Identified

As a business, the Employer needs to outline any identified workplace relations risks and periodically review the risks associated with our business activities. The Employer has identified the following risks:

- Industrial action against the Employer
- Unproductive management of projects
- Non-compliant workplace health and safety practices
- Compliance with procurement requirements
- Negative morale of the workforce
- Not meeting contractual requirements
- Employees working away from home

6.2. Risks Controlled

After identifying risks related to industrial relations, the Employer must control those risk to ensure they do not affect our business activities. Risk control measures include:

- Implementing and monitoring of internal management plans
- Employing and assigning experienced and competent people to their applicable roles to ensure that this Employee Relations Management Policy is implemented effectively
- Employing and assigning experienced and competent people to their applicable roles to ensure that the project is managed effectively and productively
- Regular review of contractual requirements including procurement to ensure requirements are met
- Regular site meetings between management and employees to maintain positive levels of consultation, ultimately boosting morale in the workplace
- Ensuring that all employees working away from home are remunerated as per their applicable EBA and are effectively supervised and monitored while they are working away from home

7. Consultation

The Employer will implement a communication requirement on all subcontractors and supervisors to report regularly on industrial issues as well as immediate reporting of potential disputes and actual disputes.

There will be a regular agenda item for pre-start or 'toolbox' meetings that addresses employee relations and/or issues affecting employee relations.

The Employer will report to the Project's representative regularly on industrial relations issues as well as immediate reporting of potential and actual disputes.

7.1. Policies & Procedures

The Employer has several internal policies and procedures which cover the contents not detailed in this plan and are communicated to employees through the Employer online induction. If a new policy or procedure is created, all relevant personnel will be consulted regarding the procedure.

Internal Policies and Procedures

- Schedule 1 to Code of Conduct: Drug and Alcohol Policy
- Schedule 2 to Code of Conduct: Bullying, Harassment and Anti-Discrimination Policy
- Schedule 3 to Code of Conduct: Workplace Health and Safety Policy (including Fitness for Work Procedure found in clause 5)
- Workplace Rehabilitation Policy
- Mobile Phone Policy
- Adflow Welding Helmet Policy
- Environmental Policy
- PPE Policy
- Smoke Free Workplace Policy
- Transport and Heavy Haulage Policy

- Use of Company Vehicles Policy
- Workplace Rehabilitation Policy
- Young Worker Policy

7.2. Management Plans

The Employer has several internal management plans which cover the contents not detailed in this plan and are communicated to employees through the Employer online induction. If a new management plan is created, all relevant personnel will be consulted regarding the plan.

Internal Management Plans

- SA.009 – Health and Safety Management Plan
- SA.010 – Site Specific Health and Safety Management Plan
- SA.048 – Emergency Evacuation Plan
- QA.012 – Quality Assurance Manual

7.3. Health & Safety Representative

Employees of the company may, in accordance with the Work Health and Safety Act, elect a health and safety representative (HSR) who will be provided with appropriate training, and the appropriate resources to effectively carry out their role. The HSR will be consulted regarding WHS issues affecting the work group that he or she represents and will be briefed on outcomes management meetings relating to their area of work.

The HSR will be allowed to carry out the following functions in his or her area of responsibility:

- Inspect the workplace, and carry out immediate inspections following any injury, work illness or dangerous occurrence
- Accompany an inspector during a workplace inspection
- Be present at any interview between an employee and an inspector (where agreed by the employee)
- Bring outside assistance to the workplace to assist them with their functions following approval
- Communicate between management and employees where required for industrial relations related matters

7.4. Group Discussions

Supervisors shall conduct pre-start meetings at the beginning of each shift. The purpose of these meetings is to convey and exchange information regarding any concerns. Topics discussed could include daily activities and the hazards associated, changes that will impact daily activities, reviews of recent incident reports, incident or hazard alerts and any safety trends that have been identified, industrial relations matters.

Every member of the group should be given the opportunity to express their concerns and make recommendations. Other items such as work for the shift, activities of other contractors and general business can be discussed.

8. Subcontractors

At this stage, the Employer does not intend to use any subcontractors on this site, however, should the need arise to do so, we will follow the following procedures.

- The Employer has implemented procedures and documentation to ensure that we comply with Code compliance and that all subcontractors & suppliers engaged in any such works are compliant with the National Code of Practice for the Construction Industry
- Upon engaging a sub-contractor, we would request they supply us with their relevant paperwork for code compliance – this would be requested in the form of a letter set out below

“We are looking to engage your Company (insert Company name) on (insert project name). To do so, we are requesting that you forward to us your relevant paperwork for code compliance” – any paperwork received is scanned and filed electronically.

The Employer will not, without written approval from the principal contractor:

- Subcontract the work under contract related to steel fabrication and erection

If the Employer engages a subcontractor, the Employer will ensure that:

- Subcontractors acknowledge and comply with industrial agreements
- Subcontractor employees are signed on to relevant industrial agreements
- Subcontractors comply with all WHSQ requirements set by the principal contractor and the Employer
- Subcontractors are approved by the principal contractor

9. Terms & Conditions of Employment

The terms and conditions of employment satisfy all legal and regulatory requirements and meet or exceed:

- The Manufacturing and Associated Industries and Occupations Award 2020 and any other applicable awards or enterprise bargaining agreements
- *Superannuation Guarantee (Administration) Act 1992* (Cth) requirements
- Equal opportunity, discrimination, and workplace harassment laws
- Workplace health and safety laws
- Any other laws or regulations governing work practices

The terms and conditions of employment also recognise existing standards for employment conditions in comparable industries in the Brisbane metropolitan area.

9.1. Employment Conditions

The Employer hires the best people available to perform each role. We select these people based on their skills, knowledge, abilities, and attitude and ensure there is no discrimination on grounds unrelated to the requirements of the job.

- To comply with the Employer's instructions, Policies and Procedures for Workplace Health and Safety at the Workplace
- For an employee to use Personal Protection Equipment (PPE), if the equipment is provided by the employers and the employee is correctly instructed in its use
- Reporting to the Supervisor immediately, any unsafe conditions, activities or dangerous occurrences or injury in the workplace
- Assisting new employees and workers in the correct work procedures and practices
- Work in a manner that will not endanger themselves or any other person
- Report any defective or damaged PPE, equipment or gear and return the item/s to the Supervisor for replacement or repair
- Not to interfere wilfully or recklessly or misuse anything provided for Workplace Health and Safety at the workplace
- Not to engage in any occupation that requires a certificate unless relevant certificates or permits are held
- Not to attempt any task unless they are capable and competent to safely carry out the task
- Not to wilfully injure themselves or other persons
- Be free from the effects of drugs and alcohol at the workplace (refer to Schedule 1 to Code of Conduct: Drug and Alcohol Policy and Schedule 3 to Code of Conduct: Workplace Health and Safety Policy, clause 5 Fitness for Work Procedure)
- Participate in Safety Meetings and Safety Programs
- Use tools only for their designed purpose
- Keep all plant clean and tidy
- All containers and bottles must be clearly labelled
- Recognise and report hazards
- Do not deface, destroy, or graffiti any company property or equipment
- Personal media players of any description are not permitted
- To treat all persons with respect and do not engage in any form of workplace harassment.

9.2. Right to Work in Australia

It is a legal requirement that all staff members have the right to work in Australia. If you are invited to an interview, you will need to demonstrate your right to work in Australia by providing an original of one of the following documents:

- Australian Passport
- Australian Citizenship Certificate and photo ID
- Australian Birth Certificate (the birth certificate must show that at least one parent was born in Australia- if it does not, and you were born after 20 August 1986, you will also be required to provide one parent's current Australian Citizenship Certificate or Permanent Residence Visa)
- New Zealand Passport with the Australian Immigration Entry Stamp
- Foreign Passport with Permanent Residency Visa
- Foreign Passport with the appropriate Visa work conditions

All staff members from overseas will have their work visas checked through the Visa Entitlement Verification Online (VEVO) service. A copy of your right to work document will be retained for your file if you are successful. If you are subsequently found not to have a legal entitlement to work in Australia, you will be instantly dismissed.

If you get a new Visa or become a permanent resident of Australia, you must notify Payroll as soon as possible and give them evidence of the change.

The Manager arranges for supply of uniforms, name badges, IT Access, and business cards as appropriate.

9.3. Referee Checks by Other Companies

Only the Manager is permitted to respond to reference check requests by another employer or company for an existing or past staff member. The Manager will confirm dates of employments, position held & responsibilities & accountabilities.

9.4. Unsolicited Applications

Occasionally people may drop their resumes into the Employer in case positions become available in the future. When this happens, the resume will be forwarded to the appropriate manager.

9.5. Payroll & Attendance

Employee attendance will be managed by employees reporting to their supervisor before and after their shift, with shift times recorded via an internally developed software program and then sent through to management for review.

Once attendance records have been reviewed, the records will be sent to payroll for processing via an accounting software program.

9.6. Training & Related Matters

Training will be managed in line with the Employer Workplace Health & Safety Management Plan, including trainees and apprentices (refer to SA.009 – WHS Management Plan).

10. Types of Employment

All staff members of the Employer are employed as full-time, part-time, casual and contract staff members. The maximum ordinary hours you will work in any one shift, no matter your employment type, will be twelve hours, under extraordinary circumstances you may be asked to work longer hours if it is agreed upon between both parties and if in line with fatigue management procedures.

11. Workplace Agreement

The Industrial instrument that may cover wage/remuneration, outcomes, and conditions of employment for some employees engaged by the Employer are the Beenleigh Steel Fabrications Pty Ltd and CFMEU Union Collective Agreement and the BSF Mobile Cranes Certified Agreement 2023-2027 (the EBAs) and any relevant modern award.

The relevant EBAs may also cover items not detailed in this Employee Relations Management Policy including:

- Shift Work & Allowances
- Productivity Measurement
- Inclement Weather
- Employee Representatives
- Sham Contracting
- Freedom of Association
- Security of Payments
- Temporary Foreign Labour
- Quality Building Materials

11.1. Grievance & Dispute Management

The Employer's relevant EBA and the Employee Complaints, Disputes and Grievances Policy cover 'Grievance & Dispute Settling Procedures'

In addition to the specified dispute procedures the following is considered.

- The Employer will take all reasonable measures to prevent the occurrence, and to minimise the continuance of industrial action at or affecting the site
- All industrial disputes and potential industrial disputes and matter that may lead to an industrial dispute will be reported to the Project's representative. The report must include the persons and/or parties in dispute and the circumstance of the dispute
- The Employer will comply with any direction in relation to the dispute or potential dispute from the Project's representative
- The Employer will participate in any meeting called by the Project's representative to deal with Project industrial relations.

If a dispute relates to:

- A matter arising under the relevant EBA; or
- The National Employment Standards.

This term sets out procedures to settle the dispute:

- An employee who is a party to the dispute may appoint a representative for the purposes of the procedures in this term
- In the first instance, the parties to the dispute must try to resolve the dispute at the workplace level by discussions between the employee or employees and relevant supervisors and/or management
- If discussions at the workplace level do not resolve the dispute a party to the dispute may refer the matter to Fair Work Australia
- Fair Work Commission (FWC) may deal with the dispute in 2 stages: -

- FWC will first attempt to resolve the dispute as it considers appropriate, including by mediation, conciliation, expressing an opinion or making a recommendation; and -
- If FWC is unable to resolve the dispute at the first stage, FWA may then:
 - i. Arbitrate the dispute; and
 - ii. Decide that is binding on the parties

Note: If FWC arbitrates the dispute, it may also use the powers that are available to it under the Act.

A decision that FWC makes when arbitrating a dispute, is a decision for the purpose of Div. 3 of Part 5.1 of the Act. Therefore, an appeal may be made against the decision.

While the parties are trying to resolve the dispute using the procedures in this term:

- An employee must continue to perform his or her work as he or she would normally unless he or she has a reasonable concern about an imminent risk to his or her health or safety; and
- An employee must comply with a direction given by the employer to perform other available work at the same workplace, or at another workplace unless:
 - The work is not safe; or
 - Applicable occupational health and safety legislation would not permit the work to be performed; or
 - The work is not appropriate for the employee to perform; or
 - There are other reasonable grounds for the employee to refuse to comply with the direction

The parties to the dispute agree to be bound by a decision made by FWC in accordance with this term.

12. Right of Union Entry

The Employer will apply the right of entry provisions strictly in accordance with the *Fair Work Act 2009* (Cth) and the *Work Health and Safety Act 2011* (Qld) in respect of the applications for entry made in the respect of direct employees and will require subcontractors to apply the following procedures;

- Entry will only be considered if the appropriate written notices have been made strictly in accordance with the respective Acts and with the minimum notice period observed
- The Project's representative will be advised of the receipt of the notice and whether such notice will be consistent with the respective Acts. A copy of the notice will be forwarded to the Project's representative
- The person seeking entry will only be allowed access in the prescribed non work periods
- The person seeking entry will be escorted at all times on the Project by a management representative and will be required to observe all safety requirements
- Any breach of the right of entry in terms of leaving the employers workplace and/or remaining on site beyond non work periods will be reported to Project's representative immediately

- Any request for immediate entry for alleged breach of the *Work Health and Safety Act 2011* and/or the *Fair Work Act 2009* (Cth) shall be referred to the Project's representative and the particulars of the alleged breach will be sought from the person/s seeking entry. The approval for entry will not be granted to such person(s) until approved by the Project's representative
- On the completion of entry by the persons in terms of the respective Acts, a report on the activities and/or any matters raised will be provided to the Project's representative.

13. Industrial Relations Management Records

The Employer will maintain the following records and ensure that the industrial relations management records that are maintained are as follows:

- Time and wage records for direct employees as per the relevant legislation
- Training records for industrial relations
- Reports on industrial action, grievances and follow up measures
- All applicable industrial instruments and codes of practice
- Audits of subcontractors in respect of compliance

14. Workplace Health & Safety

It is the policy of the Employer to encourage a culture of cooperation, initiative and responsibility within the workplace to maintain a safe and healthy working environment for all employees.

The Employer recognises our moral and legal responsibility to provide a safe and healthy work environment for workers. Our objectives can be met with continual improvement to the Safety Management System and ensuring all work practices comply with the legislative duties, current industry standards and ISO 45001 requirements.

The Employer recognise that health and safety in our workplace is an essential need and expectation of our employees, clients, suppliers, and relevant regulators. Our aim is to continually improve our health and safety performance using our internal management system.

15. National Code of Practice for The Construction Industry

The Employer acknowledges and accepts its responsibilities to ensure the industrial relations provisions of the National Code of Practice for the Construction Industry (Code) and Implementation Guidelines are observed in full. Accordingly, the Employer will remain code compliant in respect to its own industrial instruments and those of its subcontractors contracting on the Project. In particular, the following actions will be undertaken:

- Applying Code compliant Workplace agreements/industrial agreements
- Applying contract and tender documentation to ensure understanding and compliance with the code by subcontractors, suppliers, and consultants
- Monitoring on site activities to ensure code compliance
- Reporting on breaches of the code
- Ensuring a code compliant Right of Entry Practice is applied.

Training & Development Policy		
Version #: 1	Authorised by: AS	Original Issue: Nov 2025
Last Review Date: Nov 2025	Reviewed by: OA	Next Review Date: Nov 2026

Policy Context:	
Related Polices and Documents	Code of Conduct Company Policy
Legislation or Other Requirements	<i>Fair Work Act 2009 (Cth)</i>

1. Policy Statement

The training and development of employees is a major focus of Beenleigh Steel Fabrications Pty Ltd, BSF Mobile Cranes Pty Ltd and BSF Design Solutions Pty Ltd (the Employer). We believe that giving workers the opportunity to learn is beneficial to both the Employer and our employees as individuals. Our objective when training and upskilling workers is to help them realise their full potential, become valued members of the workforce, and achieve the quality workmanship our company is renowned for.

While focusing on training and development, we also recognise the importance of providing opportunities for young people in the form of apprenticeships and traineeships.

2. Aims & Objectives

As part of our commitment to training and development, the Employer aims to employ trainees and apprentices to a minimum of 10% of our company wide workforce.

Apprenticeships and traineeships offered by the Employer include:

- Certificate III in Engineering – Fabrication Trade
- Certificate III in Rigging

We promote equal employment opportunities for Indigenous people, local people, women, and disabled workers where practicable. The Employer aims to employ a minimum of 5% of our workforce from these groups.

Further to training, we also aim to develop the knowledge of existing workers by providing them with upskilling opportunities such as nationally recognised training courses and facilitating career progression by offering internal training. The Employer aims to provide 5% of our workforce with upskilling opportunities per annum.

Our training and development objectives are embedded in our management plans.

3. Contractual & Governmental Training Requirements

Where required by contractual agreements or governmental requirements, the Employer will comply with all project-specific training requirements as outlined by the relevant Contractual and Governmental Training Policies.

Equal Opportunity Policy		
Version #: 1	Authorised by: AS	Original Issue: Nov 2025
Last Review Date: Nov 2025	Reviewed by: OA	Next Review Date: Nov 2026

Policy Context:	
Related Polices and Documents	Code of Conduct Schedule 2 to Code of Conduct: Bullying, Harassment and Anti-Discrimination Policy
Legislation or Other Requirements	<i>Anti-Discrimination Act 1991</i> (Qld) <i>Human Rights Act 2019</i> (Qld) <i>Age Discrimination Act 2004</i> (Cth) <i>Australian Human Rights Commission Act 1986</i> (Cth) <i>Disability Discrimination Act 1992</i> (Cth) <i>Racial Discrimination Act 1975</i> (Cth) <i>Sex Discrimination Act 1984</i> (Cth)

1. Policy Statement

It is the intention of Beenleigh Steel Fabrications Pty Ltd, BSF Mobile Cranes Pty Ltd and BSF Design Solutions Pty Ltd (the Employer) to provide a workplace that is fair for all workers, and where all individuals and groups will be treated equally and with respect. We recognise that any distinction, exclusion, or preference which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation, constitutes an offence under the *Australian Human Rights Commission Act 1986* (Cth).

The Employer's commitment to workplace equality and diversity includes a positive approach to cultural recognition and Indigenous participation. We aim to promote employment, career development and business opportunities for Indigenous people and their communities in an environment that is both respectful and supportive.

We will strive to ensure that no person is discriminated against on any of the grounds listed in this policy in relation to equal employment opportunities at the Employer, and that this policy will also extend to persons providing or wishing to provide goods or services to the company.

2. Responsibilities

We will adopt procedures to ensure that no person is discriminated against (either directly or indirectly) on the following grounds under the *Australian Human Rights Commission Act 1986* (Cth):

- Age
- Disability (including intellectual, physical, or psychiatric) whether actual or perceived, either present or past
- Marital status

- Race, colour, nationality, ethnicity, or religious beliefs
- Gender, sexuality, or pregnancy.
- We will ensure that no person is subjected to discriminatory, coercive, or misleading conduct in relation to any rights, duties or powers under the *Work Health and Safety Act 2011* (Qld).

All workers are required to:

- Assist and cooperate in ensuring that all provisions of this policy are followed, and
- Actively participate in the adherence of this company policy to achieve its aims and objectives

3. Indigenous Participation Plan

To help us provide an equitable and diverse workplace, the Employer has established an Indigenous engagement plan which includes:

- Embracing the principles of the Commonwealth Indigenous Procurement Policy
- Engaging in effective consultation to improve mutual understanding when necessary
- Distributing this policy to all employees to communicate Management's firm commitment to Indigenous participation, to build awareness within the workforce and to encourage involvement and feedback
- Promoting employment, education, and training opportunities for Indigenous people where possible
- Providing a working environment that is culturally sensitive and inclusive for all employees
- Encouraging our suppliers and contractors in the recruitment and retention of local Indigenous people wherever possible
- Seeking business opportunities with clients, suppliers and contractors that will assist us in achieving our Indigenous engagement goals
- Measuring the impact and performance of our contribution and plan for continual improvement

Young Worker Policy		
Version #: 1	Authorised by: AS	Original Issue: Nov 2025
Last Review Date: Nov 25	Reviewed by: OA	Next Review Date: Nov 2026

Policy Context:	
Related Polices and Documents	Code of Conduct Schedule 3 to Code of Conduct: Workplace Health and Safety Policy
Legislation or Other Requirements	<i>Work Health and Safety Act 2011 (Qld)</i> <i>Work Health and Safety Regulation 2011 (Qld)</i>

1. Policy Statement

As part of our commitment to achieving the principles of health and safety in our workplace, we recognise our moral and legal responsibility to provide a safe and healthy work environment for workers, contractors, clients, and visitors. This commitment also extends to ensuring that the rights and entitlements of young workers – ages ranging from fifteen to twenty-four – are recognised and protected whilst working for Beenleigh Steel Fabrications Pty Ltd, BSF Mobile Cranes Pty Ltd and BSF Design Solutions Pty Ltd (the Employer).

Due to the high-risk nature of work in the construction and manufacturing industry, the risk of injury to young workers is significant and affords special consideration. Young workers and those new to the workforce often lack the experience to be cautious in regard to workplace safety.

2. Aims & Objectives

The Employer will, as far as it is reasonably practicable, ensure young workers are mentored and supervised while conducting any work-related task to reduce their risk of injury or illness. The Employer will assess the young worker's skill set and take into consideration the time they have spent in the industry and only set appropriate tasks to minimise risks involved. We will ensure that employment conditions of young workers are commensurate with legislated conditions applicable in a particular jurisdiction, and where not specified, in line with conditions applicable to other workers.

3. Responsibilities

We will determine the application of legislation for workers at the Employer and will ensure that we are aware of the specific conditions that apply to the employment of young workers, prior to their employment commencing.

The Employer will ensure that working conditions for young workers conform to the National Employment Standards. We recognise that unless otherwise specified, young workers are entitled to the same conditions of employment as an adult.

We recognise that:

- Some variations from adult conditions may be found in areas such as maximum or minimum allowable hours of work, prohibited hours of working, and timing and duration of breaks.
- Employment of school-aged children may be restricted by regulations outside of stipulated hours, and that regulations differentiate between the hours that a child can work on a day when they are required to attend school and a day when they are not required to attend school, and that a distinction is also made between the maximum hours that a school-aged child can work during a school week and a non-school week.
- It is an offence for an employer to require or permit a school-aged child to perform work when they are required to attend school, and that a parent commits an offence if he or she allows a child to work when they are required to be at school.

Modern Slavery Policy		
Version #: 1	Authorised by: AS	Original Issue: Nov 2025
Last Review Date: Nov 25	Reviewed by: OA	Next Review Date: Nov 26

Policy Context:	
Related Polices and Documents	Code of Conduct Schedule 2 to Code of Conduct: Bullying, Harassment and Anti-Discrimination Policy Schedule 3 to Code of Conduct: Workplace Health and Safety Policy Employee Complaints, Disputes and Grievances Policy Leave Policy
Legislation or Other Requirements	<i>Work Health and Safety Act 2011</i> (Qld) <i>Work Health and Safety Regulation 2011</i> (Qld) <i>Modern Slavery Act 2018</i> (Cth)

1. Policy Statement

Beenleigh Steel Fabrications Pty Ltd ACN 010 942 999, a structural steel fabrication company, and BSF Mobile Cranes Pty Ltd ACN 119 342 880, a general crane hire company, both based in Logan on Brisbane’s southside and known collectively as “the Employer”, have been trading for 44 years and 13 years respectively. The companies’ currently employ approximately 230 people.

The Employer is committed to implementing management systems to minimise the risks and eliminate the incidence of modern slavery in its own business operations and supply chain partners.

This policy is a public expression of this commitment, and outlines the means of identifying the risks, mitigation strategies, and the measures for assessing the effectiveness of those strategies. These have been adopted in accord with the *Modern Slavery Act 2018* (Cth).

2. Reporting Entity, Structure and Operations

The Employer is a joint reporting entity in accord with section 14 of the *Modern Slavery Act 2018* (Cth). The Employer’s registered office and principal place of business is 215 Gilmore Road, Berrinba QLD 4117.

Both entities are private companies incorporated in Australia and are owned and managed by two directors, Frank Boyes and Anthony Stoeckert.

The Employer is an Australian industry leader in the supply, fabrication and erection of medium to heavy structural steel, servicing both the private and public sectors. Our fields of expertise include project management, design solutions, architectural finishes, precast concrete erection, shear studs and surface treatment. We directly employ crews of qualified

boilermakers, welders, crane drivers and riggers thereby reducing the risk of potential modern slavery practices involving third party labour suppliers.

3. Supply Chain

The Employer has enduring relationships with valued suppliers and contractors which have been built over many years. The selection process is in accord with relevant OH&S and Quality Assurance standards, and demonstrable business integrity principles. We prioritise supporting local businesses that have the necessary skills and experience and that provide cost-effective services.

Our supplier due diligence strategy includes our resolve to:

- Engage with formal labour providers with an identifiable and distinct legitimate business entity.
- Perform risk assessment of suppliers and subcontractors in relation to any connection to modern slavery or other unethical hiring and recruitment practices such as:
 1. Sourcing labour or materials from countries with known human rights violations or a high proportion of migrant workers.
 2. Materials are sourced from industries that have previously been affected by undeclared, illegal or trafficked labour.
 3. Links in supply chain where migrant workers do not work under collective agreements.
 4. Links in supply chain where there is unskilled, temporary and/or seasonal labour.
- Identify any high-risk suppliers or subcontractors that may require a more detailed risk-assessment or workplace audit before engaging in further business.
- Implement measures to counter modern slavery including:
 1. Creating a culture that encourages supervisors and managers to talk informally to workers about issues or grievances they are experiencing such as harassment, bullying, control, coercion, or exploitation.
 2. Looking for warning signs within supply chain participants that include: -
 - Charging recruitment fees for workers. - - - - -
 - Tying workers' accommodation to their employment status.
 - Sham contracting (misrepresenting employees as independent contractors).
 - Enforcing unrealistic and unmanageably brief lead times or work schedules.
 - Suspicious purchasing practices including methods that reduce traceability; unusual labour and materials invoicing; deposit requests for goods that do not usually require deposits.
 - Unlawful wage deductions or underpayments.
 - Employees personal bank account details shared by multiple people.
 - High shared occupancy at workers' addresses.
 - Signs of injury or malnourishment.

4. Risks

The Employer has identified potential risks of modern slavery practices in its supply chain, as follows.

Raw Steel & Steel Processing:

- Countries involved are known to have links to forced labour.
- It is difficult to discern the origin of some raw materials.
- Steel production processes can pose significant risks to the health and safety of workers.
- Few employment protections may be offered for performing hazardous work.

Indirect Goods (such as uniforms):

- Raw materials harvested and processed in countries that have known incidents of modern slavery in their textile industries.
- The clothing supply chain has a high risk of slavery because of poor working conditions, excessive hours worked and minimal pay.

Hardware and Machinery:

- Labour exploitation has been linked to migrant workers in the electronics manufacturing industry.
- Forced labour is a known incident in mines where critical components are extracted.
- Complex supply chains elevate the risks.

Contractors:

- Sham contracting.

5. Actions

The Employer has implemented a Modern Slavery Policy which is communicated to all staff by means of the sustainability module of their induction training. It is also broadcast on our website and provided to our contractors and suppliers. This Policy explains the various guises that modern slavery takes and reiterates our commitment to eradicating these practices within our business operations and supply chain.

By means of our Supplier Sustainability Procurement Questionnaire, we are able to perform meaningful risk assessments and monitor our suppliers', and therefore our own, progress in implementing the Policy.

6. Assessment

The Employer is committed to the continuous improvement of its business management systems, and its interactions with employees, contractors, suppliers, and consultants, especially in relation to the risks of modern slavery practices. This commitment is reflected in the assessment of the effectiveness of our Modern Slavery Policy and will be reported in the annual Modern Slavery Statement.

We will measure the number of employees completing the sustainability module and the depth of employee awareness of the Policy.

The Employer undertakes to track and assess our suppliers' commitment to their risk mitigation strategies at least annually.

We will monitor and address any report made by employees regarding suspected instances of modern slavery within our organisation or supply chain.

During the reporting period this statement covers, we actively engaged and consulted with both companies we own and control in the development of this statement. We discussed details of the *Modern Slavery Act 2018* (Cth) reporting requirements, information regarding the actions we intend to take to address these requirements and provided them with relevant materials and updates.

This statement was approved by the board of Beenleigh Steel Fabrications Pty Ltd, BSF Mobile Cranes Pty Ltd and BSF Design Solutions Pty Ltd in their capacity as principal governing body of Beenleigh Steel Fabrications Pty Ltd, BSF Mobile Cranes Pty Ltd and BSF Design Solutions Pty Ltd on 08 May 2025.

Anti-Bribery & Corruption Policy		
Version #: 1	Authorised by: AS	Original Issue: Nov 2025
Last Review Date: Nov 2025	Reviewed by: OA	Next Review Date: Nov 2026

Policy Context:	
Related Polices and Documents	Code of Conduct Unsatisfactory Performance, Misconduct, Discipline and Termination Policy
Legislation or Other Requirements	<i>Fair Work Act 2009 (Cth)</i> <i>Fair Work Regulations 2009 (Cth)</i>

1. Policy Statement

Beenleigh Steel Fabrications Pty Ltd, BSF Mobile Cranes Pty Ltd and BSF Design Solutions Pty Ltd (the Employer) has zero tolerance towards bribery and corruption of any form and as such we conduct business in an honest and ethical manner. We are committed to acting professionally, fairly and with integrity in all business dealings and relationships.

The Employer does not permit the making of any inappropriate promises, gifts, or excessive displays of hospitality to any third party and resists any efforts made by third parties to unfairly affect the business decision-making process in order to achieve unfair advantage or benefit.

Third parties may include but are not limited to:

- Public Officials
- Clients
- Suppliers
- Employees
- Contractors

2. Responsibilities

Personnel of the Employer have the following responsibilities and must at all times:

- Conduct all business in an honest and ethical manner.
- Be committed to acting professionally, fairly and with integrity in all business dealings and relationships.
- Not permit the making of any inappropriate promises, gifts, or excessive hospitality to third parties.
- Reject any efforts made by third parties to unfairly affect any official decision-making process to achieve unfair advantage or benefit.