

AAT WORKPLACE HEALTH AND SAFETY MANAGEMENT PLAN



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COMPANY OVERVIEW

Australian Amalgamated Terminals (AAT) is operated as a multi user facility provider to the stevedoring industry in Australia. AAT is not a stevedore but provides facilities and access to stevedores holding licences for AAT terminals.

AAT operates in the following sites:

Victoria:	Appleton Dock and Webb Dock West
NSW:	Port Kembla
QLD:	Fisherman Islands

AAT facilities handle a wide variety of import and export cargo including motor vehicles, steel products, containers, timber, mobile machines, boats, project cargo etc.

The work environment changes on a daily basis as cargo is constantly moving through the facility either by ship or landside transport. It also has high volumes of third party vehicles and pedestrians transiting the site at any one time.

PURPOSE

This document outlines the structure and content of the AAT Health and Safety Management System.

SCOPE

The AAT Health and Safety Management System has been implemented to ensure it provides a safe and healthy work environment for employees, contractors and visitors accessing the AAT site. This commitment also extends to ensuring the organisation's operations do not place the local community at risk of injury, illness or property damage.

MANAGEMENT COMMITMENT

The AAT Health and Safety Management System is a structured and integrated management system developed by AAT to provide a risk based approach to its operations.

The structure is outlined further in this document and consists of integrated systems at National and Operational levels that ensure compliance with all relevant State legislation but still provides the flexibility to meet specific site requirements.

The National System is supported by system procedures whilst operational management is supported by operational procedures, risk assessments and safe work method statements that are developed specifically to address the issues identified in the hazard identification processes and particular site requirements.

Reference:

AAT OHS Policies

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MANAGEMENT REVIEW AND CONTINUOUS IMPROVEMENT

AAT is committed to reviewing its health and safety system to continually improve performance and comply with relevant legislation and industry standards.

Health and Safety Management System Review

Elements of the Health and Safety Management System shall be reviewed every three (3) years or as required.

Site Health and Safety Management System Review

Terminal Managers shall schedule annual reviews of the health and safety management system's performance and effectiveness and provide feedback to the Managing Director.

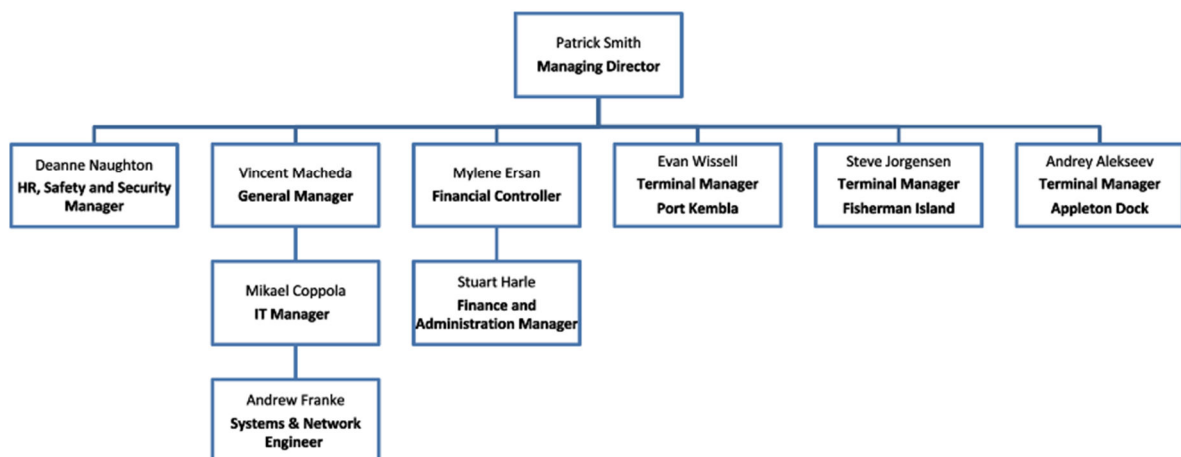
Reference: Document Management Procedure

STRUCTURE AND RESPONSIBILITY

Organisational Structure



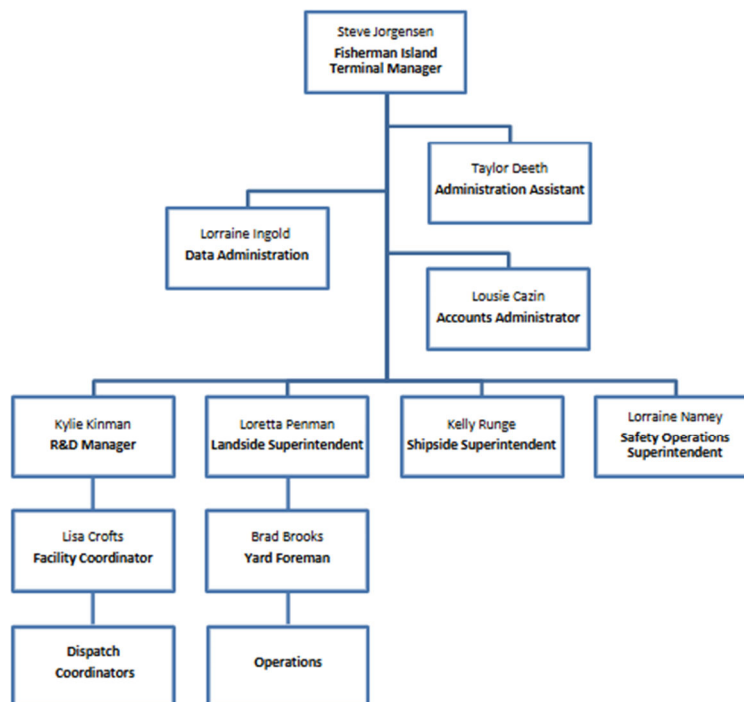
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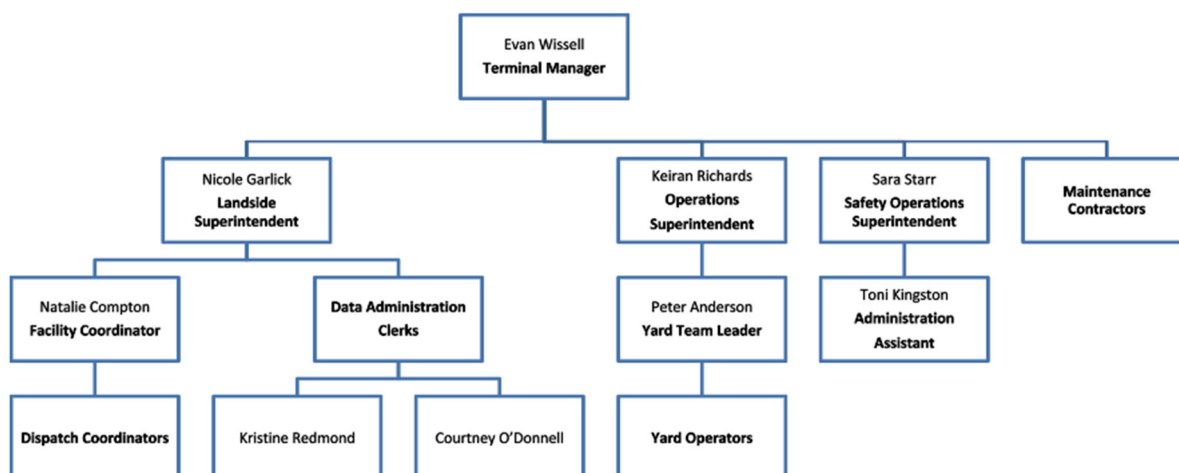
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Australian Amalgamated Terminals Pty Ltd Fisherman Island



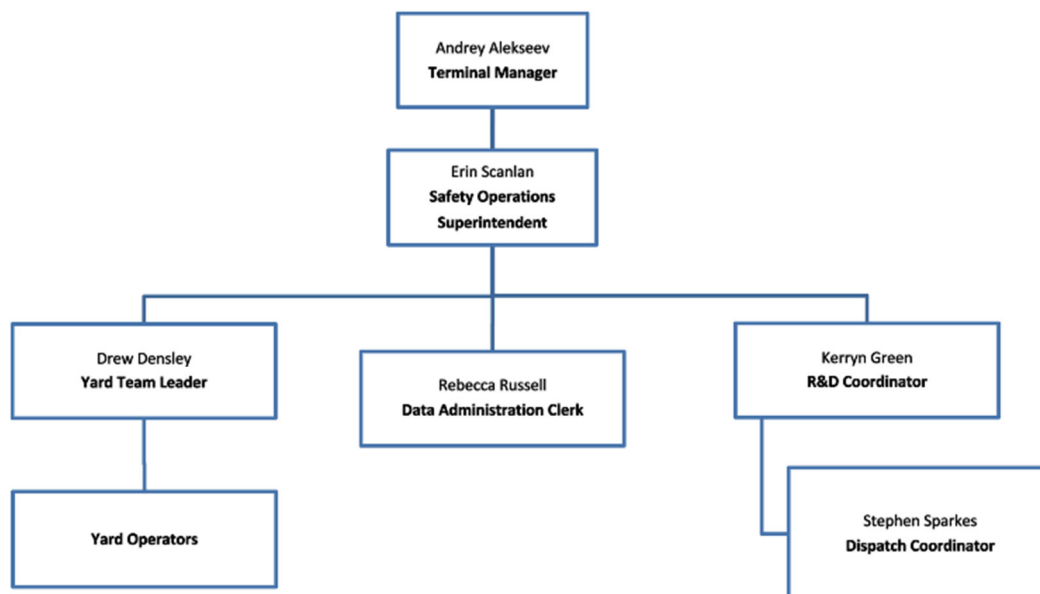
Australian Amalgamated Terminals Pty Ltd Port Kembla



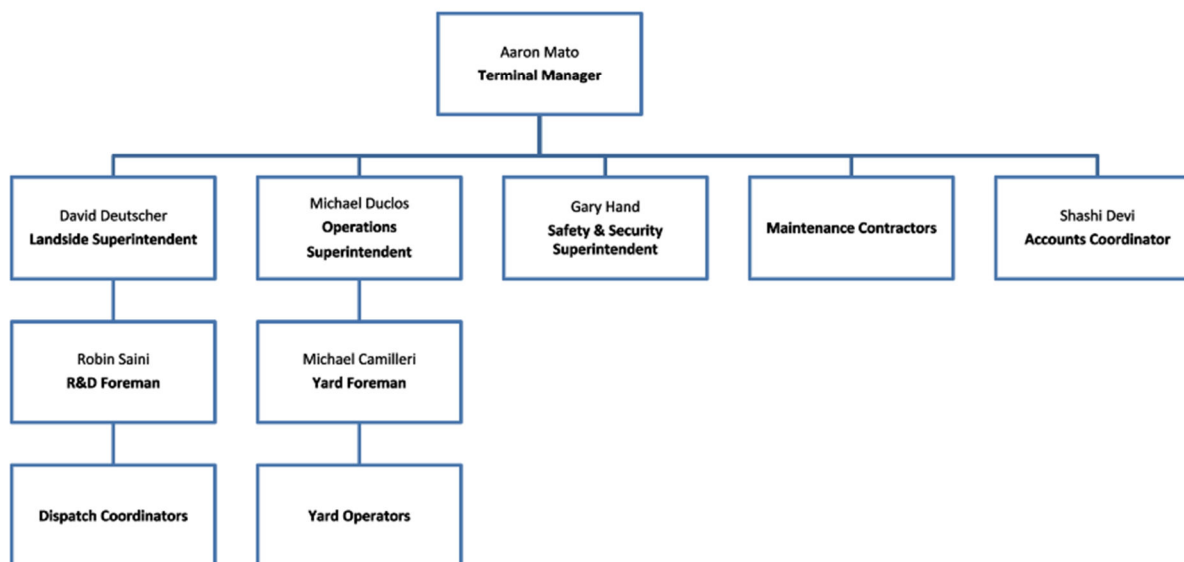
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Australian Amalgamated Terminals Pty Ltd Appleton Dock



Australian Amalgamated Terminals Pty Ltd Webb Dock West



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Roles and Responsibilities

Workplace Health and Safety is the responsibility of the Managing Director, all General Managers, Site Managers, Superintendents, Team Leaders and employees at AAT. All personnel are expected to communicate, make appropriate decisions and implement actions, as far as reasonably practicable, to prevent the occurrence of unsafe acts or unplanned events.

Managing Director and General Managers have a responsibility to ensure:

- 1) WHS Policy and related strategies and performance targets are established
- 2) Adequate budget provision is made to support health and safety programs at both a Corporate and Terminal level.
- 3) Sufficient resources are provided so the company's WHS System can be implemented, maintained, monitored and reviewed and that objectives and targets can be achieved.
- 4) Lead by Example - Visibly demonstrate commitment to WHS through participation in workplace inspections, attend Safety Committee meetings etc. when at a Terminal
- 5) Mentor those employees in their area of responsibility

Terminal Managers and Superintendents are responsible for ensuring:

- 1) Health and Safety standards and procedures are known and adhered to,
- 2) Visibly demonstrate commitment to WHS through participation in workplace inspections, Safety Committee meetings and toolbox meetings
- 3) Continual monitoring of WHS performance by AAT employees and third parties within their Terminal.
- 4) Be actively involved in the promotion and implementation of health and safety policies and procedures
- 5) Initiate actions to improve WHS within their Terminal
- 6) National and Terminal objectives and targets are implemented and achieved

AAT employees have the following responsibilities:

- 1) Abide by AAT's Health and Safety policies and procedures
- 2) Actively participate in the development and review of Safe Work Method Statements and Risk Assessments
- 3) Report any injury or near miss encountered during the day's work activities.
- 4) Actively participate in work group activities such as Toolbox Meetings, on the job training, WHS programs.

Health and Safety Representatives have the following responsibilities:

- 1) Act as the employees' representative at Safety Committee meetings
- 2) Actively participate and perform functions as required by the Safety Committee
- 3) Participate in workplace site inspections
- 4) Ensure consultation with employees in regard to WHS policies and procedures
- 5) Ensure compliance with all WHS policies, procedures and legislative requirements

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Individual employee responsibilities are detailed in the position description for the role
All AAT employees are issued with a Position Description upon employment.
Position descriptions are available from the HR Safety and Security Manager.

Reference:

Position Descriptions

LEGISLATIVE FRAMEWORK

AAT is committed to ensuring it legally complies with the various Legislation, Codes of Practice and Australian Standards that are relevant to its activities.

AAT establish, implement and maintain procedures to identify and have access to all legal and other requirements that are directly applicable to the WHS issues related to AAT activities and operations.

Legal and other requirements relating to AAT's operation are identified through industry and regulatory updates and subscription services. AAT subscribes to SAI Global for relevant Australian Standards and Safety Law and EnviroLaw for regular updates and changes to WHSE legislation.

A collection of current WHS legislation applicable to AAT activities is kept on the AAT intranet in a Legislative register, at the various Terminals and in Corporate Sydney office with the AAT HR Safety and Security Manager.

Any changes to legislation that affect the workplace are communicated to employees through Policies, staff meetings, Safety Committee Meetings, toolbox talks and Safety Bulletins.

PLANNING

Objectives and Targets

AAT has established and implemented WHS objectives, measures and targets at each relevant function and level within its structure. In establishing, reviewing and monitoring these objectives, AAT is obliged to consider its legal requirements, hazards and risks, its technological options, operation and business requirements and the views of interested parties. The objectives and targets are consistent with AAT's Health and Safety Policy, including the commitment to measure and improve safety performance.

Definitions of objectives, measures and targets are included below:

Objectives

Workplace Health and Safety objectives are the overall goals that arise from AAT's Health and Safety Policy.

Workplace Health and Safety Targets

These are detailed performance requirements, quantified wherever practicable and pertain to AAT activities. These targets arise from health and safety objectives and requirements that are to be met in order to achieve those objectives.

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Safety, Health and Sustainability Strategy

AAT has established a Safety, Health and Sustainability Strategy to aid in the achievement of its objectives and targets. This Plan is reviewed every year and includes:

- Designation of responsibility for achievement of objectives and targets at relevant functions and levels at AAT.
- Outline the way they are to be achieved and the timeframe in which they will be achieved.

There are associated health and safety procedures developed to ensure that the Plan at the Corporate level is consistent with the overall AAT Site Terminal Plans, that they are reviewed according to their designated timeframe, who is responsible for actions and that the Plan is addressed whenever there are significant changes in operating conditions.

The Plan documents the methodology for reducing health and safety risks through hazard identification, risk assessment and the development of risk control measures. The methodology also identifies who is responsible for hazard identification, risk assessment and control measures, in addition to who is responsible for reviewing activities and the frequency of review.

Reference:

AAT Safety, Health and Suitability (SHS) Strategy
Site Workplace Health and Safety Plans

RISK MANAGEMENT

Risk Management Process

AAT recognises its responsibility to identify any foreseeable hazards to persons or property that may arise from its activities. AAT's Risk Management Procedure provides the following risk management process and has been applied to ensure that control measures implemented are monitored for effectiveness:

- Identify hazards and risks involved in workplace activities
- Use Hierarchy of Control to control the identified hazards and risk
- Implement control measures
- Monitor and review

Risk Matrix

The AAT Risk Matrix is shown in AAT's Risk Management Procedure and provides a semi-quantitative measurement based on consequence and likelihood and is used as the means of broadly determining the risk acceptability or tolerability of risk. It is the primary tool used by AAT for the analysis and evaluation of health and safety risk.

Site Risk Register

Each AAT site has developed and maintains its own site specific risk register. The register is a living document that constantly changes and evolves as a result of incidents or near misses that may occur on site, new initiatives, legislative changes etc.

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The register is prepared in consultation with representatives from AAT management and employees, including the HSR. It is reviewed annually and signed off by the Terminal Manager. A copy is kept locally with the Safety Superintendent.

Risk Assessments and Safe Work Method Statements

Risk Assessments and Safe Work Method Statements are developed, in consultation with employees, to control specific tasks and processes that occur on site.

There are 3 types of Risk Assessment Worksheets that can be used depending on the type of workplace hazards that need to be assessed. These are:

- Safe Work Method Statements – this is an assessment for workplace tasks performed by employees and contractors. These will be used to assess job tasks to create safe operating procedures and find control measure to eliminate task related hazards
- Plant Risk Assessment – this is a risk assessment specific to fixed and mobile plant. Plant Risk Assessment are completed from an operational basis only. Maintenance risk assessments are completed by the Maintenance Department. Plant Risk assessment is to be read in conjunction to the Manufacturer's Risk Assessment The sheet covers 3 considerations in assessing plant.
- Hazardous Chemical/Dangerous Goods Risk Assessment- This is to be used when assessing the handling of hazardous chemicals and dangerous goods within the workplace.

Job Safety Analysis

A Job Safety Analysis is completed when the task to be performed has no formal procedure or is outside the scope of the current Safe Work Method Statement. If the task is going to become a regular process, then a SWMS will need to be completed.

Consultation

Consultation with employees is conducted at all stages of the risk management process. Once the hazards have been identified an assessment is prepared by a site Risk Assessment Team. This team comprises the Safety Superintendent, HSR and a number of employees who may have expertise in the task being reviewed. The final risk assessment/SWMS is then signed off by the Team and the Terminal Manager.

Hazard Identification and Reporting

All AAT employees and site users are required to report any hazards they may encounter whilst on the AAT Site. This requirement is stipulated in the AAT site induction for employees and contractors.

If the hazard can be rectified immediately, without further risk, then the person should do so. Where there is an ongoing risk, the area shall be made safe and then reported to the supervisor/team leader/team leader and AAT Management for further assessment and control.

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A hazard report form is to be completed once the hazard has been controlled. Hazard Report Books are provided to all AAT employees. Hazard reports are recorded in On-line Incident Reporting System -INX together with the appropriate actions taken.

Incident Reporting

All incidents shall be reported to AAT Management. The person involved shall complete a manual Incident Report Form and submit it to an AAT Superintendent/Supervisor.

The details of the incident report will be entered into On-line Incident Reporting System (INX).

Incidents recorded in INX will have actual and potential Risk Ratings assigned, have root causes, contributing factors and corrective actions, included in the investigation via the online reporting system INX.

Infringement Notices

As part of AAT's Risk & Incident Management focus, AAT has implemented an Infringement Notice system to AAT sites.

AAT Management and Site Security personnel are authorised to issue an "Infringement Notice" in the event that a contractor or site user employee breaches any AAT WHS, Traffic Management or other AAT Policies.

Infringement notices will be issued to the offender at the time of the occurrence and a letter forwarded to the employer of the offender stating what breach occurred.

If a second infringement is issued to the same employee for any OHS breach, a letter will be sent to both the employer and offender warning that any further offences will result in access to the site being restricted.

Should any site personnel/stakeholders receive three (3) offences of any nature within a 3 month period, the person concerned will be suspended from site for a period determined by the Terminal Manager.

Any breach of AAT site rules or the WH & S Act is considered to be a major safety infringement

Infringement Notices are to be entered into a Register in Sharepoint. They are also to be tabled for discussion at WHS meetings

Reference:

Risk & Incident Management Policy
Infringement Notice Procedure
Site Risk Registers
Safe Work Method Statements
Jobs Safety Analysis (JSAs)
Incident Report Form
Hazard Report Form

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CRITICAL RISK MANAGEMENT

Critical Risks have been adapted from Qube Holdings, Critical Risks are risks that have the potential to result in events that would significantly impact the business, these having a consequence classification of 'Critical' in accordance with the Workplace Risk Management Procedure and associated Risk Matrix. 'Critical' consequence descriptor – an event resulting multiple fatalities and/or likely environmental protection agency prosecution

The purpose of this Critical Risks procedure is to

Identify risks to the business that have the potential to result in critical or catastrophic events

Ensure control measures are implemented to prevent realisation of potential critical events

Review the effectiveness of control measures in mitigating critical risks with practical application

Critical Risk Control Measure Verification are completed on a monthly basis, on a site level, include work involvement. Verification checklists are completed in INX and any impairment have actions raised.

Targeted Critical Risk Control Measure Verification tools have been created for the following Risks:

- Working at Heights
- Lifting operations / using cranes
- Bulk Chemical Storage
- Mobile Plant and Pedestrian interaction
- Energised Plant, Isolation and Lockout
- Security / site access
- Severe Weather Conditions / event
- Storage of flammable materials (facility fire)
- Restricted or confined space

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CHANGE MANAGEMENT

Changes in the workplace which may affect health and safety need to be managed to ensure that:

- hazards and risks are identified and controlled;
- any knock on effects are identified;
- changes are reviewed and approved by competent persons;
- relevant employees and stakeholders are identified and informed; and
- management system documentation is updated to reflect the change.

Any changes made must be in accordance with AAT's Change Management Procedure.

Reference:

Change Management Procedure

COMMUNICATION AND CONSULTATION

Feedback and Consultation

To be able to provide and maintain a safe working environment, AAT actively seeks to consult with its employees through:

- Daily Toolbox Meetings
- Monthly National Toolbox Talks
- Safety Engagements
- Safety Committee Meetings
- Safety Bulletins and Alerts
- HSE Noticeboards

AAT also supports consultation with third party operators particularly when proposing site changes, introducing new initiatives, or addressing WHS issues. The consultation processes include:

- Transport Forums
- Joint OHS Meetings
- Safety Bulletins and Alerts
- Contractor Observations and Reviews

Access to Health and Safety Information

AAT provides its employees with open access to health and safety information via an onsite kiosk machine located in the amenities room.

The information provided is accurate, up to date and easily accessible to all personnel. The Safety Operations Superintendent/Supervisor is responsible for ensuring the information uploaded is current and accessible.

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Electronic communication of health and safety information is also available on the AAT Intranet site which is maintained by the HR Safety and Security Manager. This site is available to anyone with access to AAT's intranet.

Toolbox Meetings

Toolbox meetings provide employees with the necessary information they need to be able to work safely whilst on site. They are provided with an overview of the day's activities such as vessel and yard operations, cargo movements and traffic management. They are also notified of their task for the day and any site specific safety issues that may be relevant. Feedback during these meetings is encouraged.

A record of the meeting, matters discussed, attendees etc. is maintained. The document is signed off by the Superintendent/Supervisor and counter-signed by the Terminal Manager.

Safety Committees

AAT has a joint Safety Committee.

The joint OHS Committee comprises of representatives from the Stevedores, Maintenance Contractor, Security and any other relevant stakeholders. Meetings are held at a minimum of every 3 months.

Reference:

OHS Committee Procedure

Safety Bulletins and Alerts

Safety Bulletins and Alerts are used to inform employees and site users of important safety information such as incidents, hazards, traffic changes etc., relevant to the site.

Topics may include:

- Actions and lessons learned from incident investigations
- Changes to traffic management
- Notices of specific hazards entering site
- Initiatives being trialled or implemented
- New procedures or processes

Safety Bulletins and Alerts are discussed at AAT toolbox meetings and tabled for discussion at OHS Meetings. Copies are also distributed to site users for discussion at their respective toolbox meetings and OHS Committee meetings.

Reference:

Safety Alert / Bulletin template

HSE Noticeboards

HSE Noticeboards are located in the employee's amenities rooms and are used for the purpose of sharing health and safety information.

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Information displayed on the noticeboards include:

- Safety Alerts / Bulletins
- HSE policies
- HSE Committee meeting minutes
- Elected HSE representatives
- First aid trained personnel
- Other important notices relating to health and safety

Issue Resolution

AAT provides systems to ensure that all issues raised on site are resolved in a timely manner. However, where health and safety issues cannot be resolved in a timely manner, the Health and Safety Resolution Procedure should be followed which outlines the process for the resolution of issues.

Reference:

Resolving an OHS Issue Flowchart

INCIDENT REPORTING AND INVESTIGATION

Incidents and Near Misses of all types must be reported immediately in accordance with AAT's Incident Reporting & Investigation procedure.

Recordable events include;

- Injury / Illness / Disease (*including LTI - Lost Time Injury, MTI – Medical Treatment Injury, FAI -First Aid*)
- Environmental Incident
- Dangerous / Serious Occurrence
- Damaged Plant / Property / Vehicle

AAT incident reporting protocols shall be followed to ensure that there is prompt treatment of injuries, immediate corrective actions are implemented, a thorough investigation is carried out and notification is within the appropriate timeframes.

AAT maintains a database of all injuries and incidents along with the associated investigation and action plans. The database is managed through Qube's online reporting system INX.

AAT employees, contractors and visitors to site are made aware of actions to be taken in the event of an incident or emergency as part of the induction process.

Investigations

An effective incident investigation requires strong commitment and involvement from all levels of staff to ensure a focus on uncovering causal factors rather than placing blame and that the investigation is followed by decisive action to correct deficiencies.

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Incidents are to be investigated in INX and Depending on the Actual and Potential of the incident, an ICAM investigation may be required. The focus of an ICAM investigation is to identify the facts and root causes of the incident.

The key steps in the investigation process are as follows:

1. The appointed investigator gathers all relevant information, photos, witness statements, plant records, safe work instructions, training records, etc. and conducts interviews with involved person/s.
2. The investigator completes the investigation report and forwards the report to the Terminal Manager for review and approval.
3. The investigator uploads the report into the online reporting system INX.
4. An action plan is to be developed for any corrective actions, and added into INX with due dates
5. Investigation findings and preventative actions are to be communicated to relevant employees. Where appropriate a Safety Alert may need to be issued to communicate the incident and findings.
6. Incident outcomes are to be shared at toolbox meetings and the relevant HSE Committee meetings.

Only trained AAT personnel are able to conduct an ICAM investigation.

Reference:

Incident Reporting & Investigation Procedure

Incident Report Form

Incident Reporting Flowchart

Incident Investigation Report

Safety Alert Form

Notification of Cargo Damage or Loss Procedure

Notification of Cargo Damage or Loss Flowchart

Notification of Cargo Damage or Loss Form

Actions for Cargo Damage or Loss

TRAINING

AAT views its employees as integral to its business success and needs to ensure that all employees receive the identified training required to perform their tasks and responsibilities safely and in an efficient manner.

Training includes inductions, High Risk Work Licences, Core Competencies (Manual Handling, Bullying and Harassment, Working at Heights etc.) Safe Work Method Statements and AAT Policies and Procedures as outlined in the training needs analysis

Delivery of training and communication of information is conducted as per AAT's Training Procedure.

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Inductions

AAT Employees

AAT employees complete a site induction delivered by Terminal Management

The induction includes but is not limited to:

- General information on AAT
- Organisational structure
- General site operations
- Site layout
- Emergency procedures and assembly points
- Medical facilities and locations
- Risk management techniques for use on site
- Reference to the mandatory AAT procedures
- Safety representative information
- Incident and hazard reporting procedures
- Site specific safety procedures
- Workers' compensation and injury management

Employees who are absent from site for a period longer than six (6) months are required to complete the site induction before re-commencing work.

Visitors / Contractors

All contractors and visitors must complete the AAT online induction. This is a separate induction from the Maritime Security Identification Card (MSIC) induction.

The AAT online induction contains important health and safety information that is relevant to site.

The online induction can be completed offsite prior to arrival or via Security upon arrival.

A Completion Certificate is printed and presented to Security upon arrival together with photo identification. The completed induction is also uploaded into the local site register by the HR Safety and Security Manager. The induction register is accessible from the AAT intranet.

Inductions are valid for 2 years.

Verification of Competency (VOC)

AAT has established a process for verifying worker's competency to perform high risk tasks that are part of their role or job description.

Employees are required to complete a practical assessment on the AAT machines on site. This assessment is conducted by the Workplace Trainer / External Trainer or Competent Person prior to the employee commencing operations.

New employees are added to the site's Skills Matrix. Copies of their high risk licences are kept on their respective personnel files and uploaded into the Training Register on the AAT intranet.

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Skills Matrix

All AAT employees' skills and qualifications are entered into the site Skills Matrix together with relevant expiry and refresher dates. The site Superintendents are responsible for ensuring that the matrix is kept up to date and that training is completed and licenses are valid. A copy of the matrix is stored locally and is updated by the Administration.

Training Needs Analysis

Role based training needs are summarised into a training needs analysis and then reviewed by site management. Managers are to determine any gaps from the training needs analysis, budget for and arrange training to be completed where required. The TNA is reviewed annually to take into consideration changes in the business.

Training Records

Training records are maintained as per the AAT Training Records Management Procedure.

Copies of licences and completed training courses for AAT employees are stored in training files which are separate from their personnel files. The files are locked in a cabinet in the Terminal Manager's office and are only accessible by the Terminal Management

Reference:

Training Records Management Procedure
Training Needs Analysis Procedure
Training Administration Form

CONTRACTOR MANAGEMENT

Contractor Management is a core focus of AAT's Safety Management system. AAT is committed to ensuring that all contractor activities that have the risk of resulting in injury damage or loss are eliminated or as far as reasonably practicably reduced.

At AAT, Contractor Management is the responsibility of every manager, employee, customer, contractor or visitor regardless of position or occupation.

AAT Contractor Management Procedure outlines AAT's commitment to ensuring that its contractor management system is safe and effective at all sites.

Licence Agreements

Stevedores working on an AAT Site sign a Stevedoring Licence Agreement to ensure Stevedores' WHS obligations are clearly defined.

Contractor Inductions

All contractors to site must complete the AAT online induction. This is a separate induction from the Maritime Security Identification Card (MSIC) induction.

The AAT online induction contains important health and safety information that is relevant to site.

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The online induction can be completed offsite prior to arrival or via Security upon arrival through Rapid Induct

Inductions are valid for 2 years.

AAT online Contractor Management System (Rapid)

Contractors performing work on an AAT site must complete an application in the Rapid Contractor's online Management System. This involves providing the following documentation:

- Public Liability / Vehicle / Workers Compensation Insurances
- Company OHS Policies
- Company Procedures on the work being performed on site
- Training documentation
- Machinery Service documentation

Contractors are also required to accept AAT's site policies and procedures.

Upon completion the application is submitted to AAT for approval by Terminal Management

Gaining Access / Site Expectations

Contractors requiring access to an AAT site must complete the following process:

- Hold a valid MSIC card. If they do not have one, they can be escorted on site for a fee. Entry is permitted only once within a 12 month period.
- Complete the AAT online induction and present their Completion Certificate to Security together with photo identification.
- Complete an application in the Rapid Contractor Management System or alternatively complete a Site Safety Agreement for one off visits
- Provide 24 hours written notice of their requirement to enter site providing details of the persons entering and the reason for entry. A register of contractors and visitors to site is maintained and is updated by Superintendents, Admin staff and Security. Persons not on the daily entry list are not permitted entry until authorisation has been obtained from the Terminal Manager or Superintendents.
- PPE is mandatory on site. All personnel must wear high visibility clothing and steel capped shoes/boots.
- Contractors must comply with all AAT procedures and policies and if breached, will be issued with an infringement notice
- Contractors are not permitted to operate AAT machinery or vehicles at any time whilst on site

Contractors on site must report to AAT Operations Officer prior to moving onto the wharf to ensure that the Superintendents can advise them of any hazards in their work area.

Contractor Reviews

As part of AAT's continual improvement process, site management teams are required to complete regular Site Safety Observations. Contractor activities are monitored and compared to the procedure they provide for the task being performed. Feedback is

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provided to the contractor. If operations observed are considered unsafe, the management personnel involved may stop the activity until a safe solution is found.

Infringement Notices

Contractors on site who are found to have breached AAT's site entry requirements or have conducted unsafe work practices are issued with an infringement notice, work is ceased, and their respective management notified.

Reference:

Contractor Policy
Managing Contractors Procedure
Contractor Management Process Flowchart
Site Safety Observation Checklist
Site Safety Agreement
Infringement Notice Procedure

EMERGENCY PREPAREDNESS

Emergency Response Plan

Each AAT site has developed and maintains an Emergency Response Plan as a result of emergency scenarios captured in its site risk register. The plan includes:

- A site map with evacuation/exit routes and muster points
- Procedures to be followed when responding to identified emergency situations
- Current contact details for internal and external parties
- Emergency response team members, their responsibilities and communication procedures
- Training requirements for all personnel involved in an emergency response
- Location and type of fire alarm system, fire suppression and firefighting equipment
- Location and type of spill response equipment
- Location of first aid equipment
- Details about first aid provisions.

Emergency response plans are tested and reviewed annually to ensure they remain effective. Emergency response procedures are covered in the relevant site inductions.

Drills

Emergency Evacuation drills involving all site users are conducted on an annual basis and is co-ordinated by the Terminal Manager.

First Aid / Medical Emergencies

Each AAT worksite maintains adequate first aid facilities in appropriate locations to aid in the treatment of injuries. These facilities shall be in accordance with the codes of practice First Aid in the Workplace Code of Practice 2014, Managing the Work Environment and Facilities Code of Practice 2011

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The number of people trained in First Aid will be determined by the Terminal Manager. They will be responsible for ensuring that the number of first aiders is sufficient to meet the site / area requirements.

The identity of first aid qualified personnel must be displayed on AAT Noticeboards.

In addition to first aid kits, extra equipment and facilities may also be required, such as eye wash stations, drench showers and specialist first aid equipment. It is the responsibility of the Terminal Manager and Superintendents to ensure that all first aid facilities comply with Australian standards and are in good working order. Kits and facilities are checked monthly via the site safety surveys

Spill Response

Spill response kits are located around site as indicated on the site map. The kits are appropriately equipped to respond to the type of spill likely to be encountered and are easily and quickly transportable. AAT employees are fully trained in spill response.

Information on responding to a spill is included in induction training.

AAT Fisherman Islands and Port Kembla also has a spill trailer on site to handle larger spills/leaks. Only AAT trained personnel are permitted to use the spill trailer.

Fire

Adequate firefighting equipment is in place at each site as required by the relevant Australian Standard and based on the risk. Equipment is regularly inspected and tested by a competent contractor.

Reference:

Site Emergency Response Plans
First Aid Procedure
Environmental Hazardous Spill Actions Procedure
Fire Actions Procedure

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TRAFFIC MANAGEMENT

Traffic management is one of AAT's core focuses and we believe that this is one of the areas of highest risk. AAT is committed to ensuring that each of its sites develop and maintain Traffic Management Systems to ensure a working environment which is safe and without risks to all persons on site.

AAT Traffic management is the responsibility of every Manager, employee, customer, contractor or visitor to ensure compliance with AAT's Traffic Management Policies.

AAT is committed to ensuring that site traffic management is as safe and effective as reasonably practicable and is continuously being monitored, reviewed and improved. In light of this the following has been implemented:

- Traffic Management Risk Assessment completed by members of AAT's joint OHS Committee and signed off by the Terminal Manager. The Risk Assessment is reviewed annually, and copies distributed to all site users.
- The Site's Traffic Management Plan is prepared as a result of the Risk Assessment. Copies are distributed to all site users. It is also available to contractors and visitors via Security or the Receival Delivery Office.
- Traffic Management Audit conducted annually
- Daily traffic flow requirements are discussed at the daily Operations Meeting attended by AAT and Stevedores. A copy is emailed daily to all site users and uploaded onto the AAT website.
- Traffic Management Forums are held with Transport Companies.
- Site traffic management is included into AAT's Safe Work Method Statements for all operational tasks.
- AAT Infringement Notice Procedure enables AAT management and Site Security to issue an Infringement Notice to any person on site found to be in breach of AAT's site safety requirements.

Reference:

Traffic Management Policy
Traffic Management Procedure
Traffic Management Risk Assessment
Traffic Management Plan
Traffic Management Audit Tool
Infringement Notice Procedure

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PLANT MANAGEMENT

The Maintenance Workshop areas located at AAT facilities are owned by AAT but managed by third party contractor, under a Service Agreement.

The contractor, under this Agreement, provides, but is not limited to, the following services to AAT:

- Electrical maintenance on all machinery and operating infrastructure
- Mechanical maintenance on all machinery and operating infrastructure
- Provide qualified, trained and competent persons to carry out all necessary duties and comply with relevant OHS legislation.
- Record keeping e.g. registers, servicing schedules, hours worked
- Refuelling of all equipment and machinery on site
- Provide ancillary services e.g. jump starting

A register of plant is maintained by the Maintenance Contractors and overseen by AAT.

Plant and equipment are maintained in accordance with manufacturer's recommendation to ensure it remains safe to operate.

The maintenance software system used is MEX.

Reference:

Maintenance Operations Plan
Maintenance Service Agreement

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PERSONAL PROTECTIVE EQUIPMENT

The following PPE is issued to AAT employees on an annual basis:

- Hi-visibility long sleeved shirts
- Shorts / Trousers
- Steel capped safety boots
- Hard hat
- Eye protection
- Hearing protection

Dust masks are available upon request from the Operations office.

Any additional PPE required for specialised tasks will be provided by AAT.

All PPE provided is compliant with Australian Standards

PPE is stored in the Operations Office and the Superintendents are responsible for managing the provision and use of PPE on site.

The following PPE is mandatory for all visitors attending site:

- High visibility vest
- Enclosed footwear / steel capped shoes or boots in operational areas
- Eye protection (if required)
- Hearing protection (if required)
- Hard hat if entering crane operating areas

PPE requirements are signposted at the facility's entrances and included in the online induction

AAT Management monitor and enforce the use of PPE by employees, contractors and visitors on site.

Reference:

PPE Policy

PPE Guide

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INJURY MANAGEMENT

The Injury Management and Workers Compensation Procedure provides a standard process for injury management, including treatment and return to work of employees injured in the course of their work. The AAT Injury Management System complies with the Workers' Compensation and Rehabilitation Act 2003 and Workers' Compensation and Rehabilitation Regulation 2014.

Reference:

Injury Management Policy
Rehabilitation Procedure

HEALTH MANAGEMENT

AAT's Health Management system incorporates the following:

- Drug and Alcohol
- Smoking
- Manual Handling
- Noise Management
- Bullying and Harassment
- Employee Assistance Program
- Health Surveillance

Drug and Alcohol

AAT has a Drug and Alcohol Policy and Standard in place which includes random testing, for cause and post incident testing. The Drug and Alcohol testing is conducted by a third party contractor, AusHealth, on site.

Random testing - any worker or a select group of workers may be tested on a random day

Upon reasonable belief – a worker who shows signs of being affected by alcohol and/or drugs.

Testing after a workplace health and safety incident – a worker will be required to submit to an alcohol and/or other drugs test if they are involved in an incident.

Post incident testing is to occur immediately after an incident (if it is safe to do so). AAT Management will arrange for AusHealth to attend site to conduct the test. Alcohol testing can be conducted internally by an AAT Manager.

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Should any of the tests return a positive result, the worker will be stood down and sent home. The D&A Procedure outlines the requirement to be re-tested at a later date agreed to by the Terminal Manager prior to returning to work.

Prescription Medication

Employees on prescription medication must advise AAT Management prior to commencing work. They must provide a copy of their prescription, doctor certification confirming nil side effects and the medication box to confirm that the medication they are taking does not have any side effects that may prevent them from performing their tasks safely.

Pre-Employment Medicals

AAT has in place a pre-employment medical screening process to evaluate candidates' medical conditions and suitability for the role.

All external applicants are required to undertake a pre-employment medical prior to an offer of employment being made.

Reference:

- D&A Policy
- D&A Procedure
- Testing Schedules
- Summary of D&A Testing Procedure
- Template for Positive Test Result
- Template for Refusal to Comply
- Checklist for Positive Alcohol Test Result
- Checklist for Positive Drug Test Result
- Checklist for Refusal to Co-Operate with Testing Process
- Template for Note for File
- Template for Resolution Meeting
- Template to Contractor re Positive Test Result
- Template for Creatinine Results
- Template for Negative Test Results
- Health Surveillance Procedure

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Manual Handling

AAT's Manual Handling Policy outlines our commitment to minimise risks to health and safety arising from manual handling.

All manual handling tasks conducted by AAT have been risk assessed and evaluated with the implementation of the necessary control measures, following the hierarchy of control process.

The necessary training to support the Manual Handling Process and implemented controls is provided at induction and refresher training

Reference:

Manual Handling Policy
Manual Handling Tasks Procedure
Manual Handling Design Procedure
Manual Handling Training Assessment Form

Noise Management

Hearing loss due to excess noise in the workplace is a risk associated with many roles, particularly plant operators and has been identified in site risk registers. Noise monitoring of machines is conducted every 5 years. Hearing tests for employees are conducted every two years.

Reference:

Control of Workplace Noise Procedure
Hearing Conservation Procedure
Control of Workplace Noise Flowchart

Psychological Health at work

AAT acknowledges the increased prevalence of psychosocial injuries as documented by SafeWork Australia and other state-based regulatory bodies. Our commitment to creating healthier workplaces will continue to form a significant part of the overall our Safety, Health and Sustainability strategy. Health at AAT is holistic, considering not only physical health but mental wellbeing. AAT will identify Psychological Hazards through risk register reviews and employee engagement, AAT will ensure Mental Health First Aiders are available at AAT.

Bullying and Harassment

AAT aims to ensure that its working environment is free from harassment. Harassment, bullying, and victimisation of any type is unacceptable, and AAT aims to eliminate this conduct from the workplace.

Any person who victimises, bullies and/or harasses another person will be subject to disciplinary action, up to and including dismissal.

Information on bullying and harassment is included in the AAT site induction and training is provided upon commencement of employment. More detailed information is provided in the AAT Bullying and Harassment Policy available on the AAT intranet Human Resources page.

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Reference:

Harassment, Bullying and Violence Prevention Policy
Sexual Harassment Prevention Policy
Employee Behaviour Code

Employee Assistance Program

AAT recognises that in any instance, when an employee is not fit for work, there may be an underlying condition that has caused the situation. Confidential assistance is available through a sponsored Employee Assistance Program (EAP) for employees to seek help.

This assistance can cover all or some of the potential problems such as relationship, anxiety, stress, depression, team performance, particular work problems, financial pressures, gambling difficulties, grief and trauma, etc.

The AAT EAP provider is Access EAP.

All Access EAP counsellors are qualified, experienced professionals who have extensive training and experience in counselling, coaching and workplace consulting.

The EAP is a confidential counselling service for employees and their eligible family members.

Health Surveillance.

Health surveillance is legally required where a risk assessment indicates that an employee is exposed, or likely to have been exposed, to a hazardous substance in circumstances where:

- the national occupational exposure standard is likely to be exceeded; or
- they are at risk of suffering an identifiable disease or effect on health as a result of the exposure; and there is a reasonable likelihood that such a disease or effect on health might occur under the particular conditions of work; and there is a scientifically recognised technique which can be used for detecting indications of the disease or the effect on health.

Health Surveillance Procedure outline the potential exposures that focus on exposure monitoring additionally, the Control of Workplace Noise Procedure requires persons working in areas of excessive noise to undergo pre-employment medicals including hearing tests.

Reference:

Health Surveillance Procedure
Control of Workplace Noise Procedure

Confidential Health Records

Personnel records relating to health shall be kept for a time period as defined by legislation.

Reference:

AAT Document Management Policy

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HAZARDOUS SUBSTANCES AND DANGEROUS GOODS

Hazardous Substances

AAT's Maintenance Contractor uses hazardous substances that are necessary for the operation and maintenance of mobile plant. Examples include:

- Diesel / Fuels
- Grease / Oils / Lubricants
- Coolants
- Hydraulic and transmission fluids
- Paint

Storage of the above substances are held in the Maintenance Workshop and their use confined to ensure the mechanical functionality of plant and equipment.

Safety Data Sheets are kept for all hazardous substances stored on site

AAT site Management maintains an SDS Register of all chemicals and hazardous goods used on site by AAT. The Maintenance Manager maintains the same register for goods stored in the Maintenance Workshop. The Stevedores and Biosecurity also provide SDS registers for chemicals they store on site.

A risk assessment must be conducted for all hazardous substances used and handled taking into account health and environmental risks, method of application, quantity used, frequency of use, location where used and duration of use. Risk Assessments conducted by maintenance contractor and reviewed and signed off by AAT Management.

Copies of the SDS Register are kept in Security so if an emergency arises, Emergency Services have access to the information regarding the types of chemicals stored on site.

Reference:

SDS Procedure

Hazardous Chemical Risk Assessment Form

Dangerous Goods

The movement, handling and storage of Dangerous Goods is regulated by the Port Authority. AAT are responsible for ensuring requirements are strictly adhered to as per the Port Authority safe operating procedures for Dangerous Goods.

Training

It is a legal requirement that employees are provided with information on managing hazardous substances and dangerous goods in the workplace and that training is recorded. While general information is included in the AAT Induction package, specific formal training is provided to all AAT employees.

Reference:

Port of Brisbane Port Notice

IMDG Code 2018

NSW Ports DG Code

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HIGH RISK / HAZARDOUS WORK

Due to the inherent hazards involved in some work, additional care is required to ensure that risks are managed. High risk work is defined under the Work Health and Safety Regulations 2011 as:

- Scaffolding work where a person or object could fall more than 4 metres
- Dogging and rigging work
- Crane and hoist operations
- Forklift operation
- Certain pressure equipment operation.

Other work considered to be hazardous includes confined spaces, hot work, working at heights, exposure to live electrical equipment and mechanical stored energy devices, excavation, use and transportation of dangerous goods and disturbance of asbestos containing materials.

In many cases permit to work systems are used to control work activities and to prevent exposure to harm. AAT have implemented a permit system for the following activities performed on site:

- Working at Heights
- Hot Works
- Electrical Works

Working at Heights

AAT recognises the significant risks associated with conducting activities at height within its business operations nationally. It also recognises the legislative requirement that where there is a risk of a fall, that the risk is identified, and control measures implemented.

AAT has a detailed Working at Heights Policy and Procedure that outlines the requirements for working at heights including the issuing of a Working at Heights Permit. Working at heights is also addressed in site specific Safe Work Method Statements.

AAT employees are trained in working at heights, rescue and EWP.

Contractors requiring working at heights must provide proof of training and a copy of their high risk licence.

Fixed and Portable Ladders

AAT shall ensure all ladders comply with the relevant Australian Standards and are regularly inspected by a competent person for damage and integrity prior to use.

Confined Spaces

It is not anticipated that AAT personnel will perform activities in confined spaces. If the

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requirement arises, contractors will be engaged and must comply with the following requirements:

- Personnel shall be trained and deemed competent to work in confined spaces
- Provide a confined spaces permit
- A formal SWMS or JSA is completed for the task, considering the nature of the confined space, access, ventilation and rescue
- Confined spaces are isolated from energy sources
- Signage and barricading is erected
- Atmospheric testing occurs as required
- Correct PPE is available, and personnel are trained in its use
- A spotter is in place

Mobile Plant

Only licensed operators are permitted to operate AAT mobile plant on site.

Operators must complete a pre-operations check prior to use.

The maintenance of AAT's equipment is conducted by an onsite contractor.

Electrical Safety

Only a licensed electrician may complete electrical work.

Electrical equipment must be in good operating condition and as a minimum tested and tagged at intervals.

Residual current devices (RCD) must be in place for all fixed electrical installations and portable RCDs must be used if working away from fixed electrical sources. RCD testing should be conducted in line with the above testing frequency.

Tag Out and Isolation

The AAT Tag Out procedure has been designed to protect personnel and property from the hazards associated with defective equipment or when repairs, maintenance or inspections are being undertaken.

AAT or stevedoring personnel will not perform isolation activities. If the requirement arises, the Maintenance Contractor will isolate mobile equipment as per the maintenance contractors Isolation procedure.

Reference:

Tag Out Procedure

Testing of Electrical Equipment Procedure

ENVIRONMENTAL MANAGEMENT

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AAT is to ensure a minimum standard and consistent approach to environmental management throughout the operations. This will be achieved by ensuring specific environmental detail is captured and documented in Site environmental Management Plans.

The Site Environmental Management Plan (EMP) have been prepared to provide all personnel of AAT facilities with enough knowledge and appreciation of environmental issues to:

- ensure that the environmental impacts associated with our activities are minimised.
- ensure compliance with environmental laws, policies, and procedures.
- provide adequate training on environmental awareness at all levels.
- establish a formal reporting and document control system; and
- to continually improve our environmental performance within the Port to strive for best practice environmental management.

The Site EMP is designed to ensure compliance with Commonwealth, State and Local Council requirements pertaining to the management of environmental issues such as waste management, emissions, and other environmental impacts.

The plan provides details of environmental commitments associated with onsite operations.

Such as

- Land contamination
- Stormwater quality
- Air Contamination
- Waste Management
- Noise Management

The plan identifies potential environmental impacts during the operations phase and specifies details of proposed pollution control measures and strategies adopted to minimise any detrimental effects to the environment.

The plan also includes information on incident/risk management procedures and highlights individual responsibilities for plan implementation and methods for performance monitoring and EMP review.

The Site EMP is a dynamic document which provides a central reference for environmentally related matters and the potential risks associated with AAT operations.

Reference:

Site Environmental Management Plans

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AUDITS AND INSPECTIONS

AAT has a number of different methods in place for monitoring compliance with legal and other requirements and to contribute to the continual improvement process. These include workplace inspections, compliance audits and system audits. Where deficiencies are identified, corrective action are created to address the issue.

Workplace Inspections

All AAT sites are regularly inspected in accordance with the Site Safety & Housekeeping Procedure to identify any uncontrolled hazards or areas for improvement. The inspection is documented using the Site Safety Survey and Actions template. Upon completion of the survey, a copy is emailed to those who are responsible to close out any action items. Any actions are entered into the Site Action Register.

Site Safety Surveys are completed monthly and are attended by site users and AAT personnel.

SHS Leadership Tours

The Managing Director is required to conduct SHS Leadership Tours as per the respective KPIs in the AAT SHS Strategy as part of activities to discharge their personal Due Diligence obligations. Leadership Tours findings are recorded in INX.

Site Safety Observations

AAT Terminal Managers and Superintendents are required to complete site safety observations on contractors, site users and employee activities to ensure compliance with site safety requirements (e.g. traffic management). This also includes monitoring the task being performed and ensuring it aligns with their safe work method statement and that they have a safe area of work.

If an observation is made that deems the work unsafe or non-compliant, the work is to cease until a safe solution can be found or the non-compliance rectified. Any major issues are to be raised with the Terminal Manager. Any outstanding actions from observations are to be entered into the site's Action Register.

A Site Observation Checklist is completed Rapid Auditor for each observation

Site Safety Observations are completed on a monthly basis and numbers reported to management at the end of each month.

Safety Engagement

The purpose of safety engagements is to provide a mechanism for two-way feedback and ultimately drive improvement in safe work practices.

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Safety Engagements are recorded in INX and form part of SHS Strategy Targets and KPIs

Compliance and Systems Audits

AAT undertakes a range of health and safety audits across the business. The Managing Director and HR Safety and Security Manager coordinates the business health and safety audits. Site representatives are responsible for ensuring completion of their allocated audits.

The scope of the Health and Safety audit program includes both employees and contractors working on AAT controlled sites and includes internal and external health and safety audits.

The HR Safety and Security Manager maintains the Health and Safety Audit Procedure and Sites maintain Audit Schedules.

DATA CONTROL AND RECORDS MANAGEMENT

Document Control

AAT Safety Management System documents shall be formatted as per AAT templates. All documentation shall be developed and maintained in accordance with the AAT's Document Control procedures.

The HR Safety and Security Manager and Terminal Management are responsible for ensuring access to current and valid documentation and maintaining local records.

AAT's controlled documents are also available on the AAT intranet.

Record Management

Each AAT site shall keep records and documentation as to satisfy the requirements of the AAT Health and Safety Management System. The Terminal Manager shall ensure appropriate resources are supplied to keep local records up to date.

The storage and retention of health and safety reports and records will be maintained, retained and archived in accordance with the following approved AAT procedures:

- Procedure for Document Control Register and Numbering
- Access and Confidentiality
- Records Retention / Archive / Disposal

Reference:

Document Management Procedure

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SAFETY HEALTH & ENVIRONMENTAL KEY PERFORMANCE TABLE

AAT Strategy forms part of the Qube Divisions and Below is the list of SHS key performance indicators to drive consistent improvement in SHS

Objective	Target	Measure	Responsible	Measurement Frequency
Correction Action Closure Rate	> 95%	INX data	Safety Superintendent / Terminal Manger	Monthly
Incident Closure Rate within 30 days	> 95%	INX data	Safety Superintendent / Terminal Manger	Monthly
Class 3 Environmental Incidents	Zero	INX data	Safety Superintendent / Terminal Manger	Monthly
Workplace Inspection	1 workplace inspection per month	Inspection reports	Safety Superintendent /Terminal Manger	Monthly
Critical Risk Control Review	1 CRC review per month	Inspection reports	Superintendents/ Terminal Manger	Monthly
CRC Quality Score	> 80%	Data from INX CRC records represented in SiSense	Superintendents/ Terminal Manger	Monthly
Safety Engagement	1 per month	Number of engagements per site	Safety Superintendent	Monthly
Observations	12 per month FI & PK 6 AD and WDW	Number of observations per site	Superintendents/ Terminal Manger	Monthly
Safety Engagement - worker insights	> 80%	Data from INX Safety Engagement records represented in SiSense	Safety Superintendent	Monthly
Leadership Tours	4 annually	Leadership tour records	Managing Director	Quarterly
Management Review	1 every 6 months	Management review reports	Superintendents/ HR Safety and Security Manager	Quarterly
SHS Report	1 report per month	SHS Report	HR Safety and Security Manager	Monthly
Emergency Evacuation Exercise	Annual per site	INX data	Superintendents/ Terminal Manger	Quarterly
Internal Audit completion	Quarterly	INX data	Superintendents/ Terminal Manger	Quarterly
Consultation with the Workforce (Committee meetings)	Quarterly	Meeting records	Superintendents/ Terminal Manger	Quarterly

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NEEDS AND EXPECTATIONS OF INTERESTED PARTIES

Interested Party	Need/ Expectation	Business Risk/ Opportunity	Risk to interested party	Monitoring & evaluation	Legal or other requirement
Employees	Safe working environment Job security Competitive salary Training and Development Clear Communication	Aging workforce/ loss of skills Reduced workplace injuries, Improved well-being	Loss of job Job satisfaction/ Direct impact on health and safety	Incident reports Safety performance metrics SHS Safety committee meetings	WHS Legislation Employment contracts (EA) Consultation and Communication Procedure
Management	Effective SHS management, compliance, cost-effective solutions	Enhanced reputation, reduced costs	Ensuring overall system effectiveness	Management reviews SHS audits	Adherence to relevant WHS legislation
Customers / Clients	Safe products/ services Reliable delivery Compliance with contracts Comply with WHS and Regulations Environmental Protection Act and Regulations	Loss of market share Enhanced satisfaction, loyalty Repeat business Modern equipment (fuel efficiency reduced emissions) Reputation	Product-related incidents Service disruptions Reputation	Customer feedback Client Meetings/ Audits	Adherence to relevant WHS legislation Contractual agreements Crisis Management Plan Environmental licences and legislation Risk Register SHS Management Plan
Contractors	Compliance with WHS standards, Clear scope of work / expectations Adherence to Safe System of work	SHS compliance Invalid Insurance Reduced workplace injuries Successful project completion, Positive relationships	Direct impact on health and safety Project delays No future work Financial loss	Rapid System Management reviews	Adherence to contractual WHS obligations Permit to work MSIC where applicable Proof of competency (Licence)
Suppliers	WHS performance Ethical business practices	Unable to meet AS/NZ standards Secure business relationships Reliable supply chain	Supply chain disruptions Reputational damage	Pre purchase safety assessment Safety specification and verification checklist Management reviews	Adherence to ethical sourcing and safety requirements
Regulatory Authorities	Compliance with WHS laws and regulations	Avoid legal penalties Reputation - Maintain good relations Noncompliance Loss of EPA licence	Legal compliance and regulatory adherence Waste of government resources	Incident reports Safety performance metrics SHS Safety committee meetings Management reviews SHS audits	Adherence to national and international WHS standards Environmental licences and legislation
Unions/Employee Representatives	Employee rights Fair representation Safe working environment Job security Competitive salary Training & Development	Industrial action Noncompliance Reputation Improved labour relations Employee satisfaction	Workplace disputes Loss of job Loss of skills Job satisfaction	Union feedback SHS Safety committee meetings	Compliance with labour laws and agreements Employment contracts (EA) Consultation and Communication Procedure
Local Communities	Minimise environmental impact, Community engagement	Positive community relations, Reduced environmental impact	Environmental hazards Community dissatisfaction	Environmental impact assessments Community feedback	Compliance with environmental regulations Risk Register
Emergency Services	Effective emergency response Clear communication	Reduced response time Enhanced coordination	Inadequate emergency response Communication failures	Emergency drills Communication protocols	Compliance with emergency response regulations Emergency Response Plan
Port Authority	Compliance with client Comply with WHS and Regulations Environmental Protection Act and Regulations	Non compliance Loss of EPA licence Reputation	No future work Financial loss Port closure caused by 3rd party/weather	Internal and external compliance Valid Liability Insurance (20m)	AMSA Marine Orders WHS Act and Regulations Environmental Licences



	Emergency response/spill response Traffic Management Plan				Biosecurity Act and Regulations Risk Register SHS Management Plan
Land Owner	Lease agreement and lease requirements	Noncompliance Reputation Fines Opportunity for purchase	Financial loss Cancellation of lease	Internal and external compliance Valid Liability Insurance (20m)	Code of Practice commercial leases Environmental licences and legislation

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DECLARATION

I have read and understand my responsibilities as outlined in this plan.

<i>Position</i>	<i>Name (print)</i>	<i>Signature</i>	<i>Date</i>

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