



Health and Safety Policy Statement

COMMITMENT TO HEALTH AND SAFETY

KP Group Limited is committed to providing and maintaining a workplace that is safe and without risk to health for all workers, contractors, visitors, and others who may be affected by our operations. Whether operating as a PCBU or working under another PCBU's control, we maintain our commitment to the highest health and safety standards. Health and Safety is our highest priority and is integrated into all business decisions and operations. We recognize that every person has the right to go home safe and healthy every day, and this is non-negotiable.

SCOPE AND APPLICATION

This policy applies to all:

- KP Group employees and management
- Contractors, subcontractors, and temporary workers engaged by KP Group
- Visitors to our premises
- All work activities, whether at KP Group premises, customer sites, or other locations
- Work performed under our control as a PCBU and work performed under other PCBUs as contractors

LEGISLATIVE COMPLIANCE

KP Group Limited is committed to complying with all relevant health and safety legislation, regulations, standards, and codes of practice, including:

- Health and Safety at Work Act 2015 (HSWA)
- Health and Safety at Work (General Risk and Workplace Management) Regulations 2016
- Health and Safety at Work (Hazardous Substances) Regulations 2017
- Health and Safety at Work (Worker Engagement, Participation, and Representation) Regulations 2016
- Accident Compensation Act 2001
- All relevant Australian and New Zealand Standards (AS/NZS)
- Industry-specific codes of practice and guidance

We commit to exceeding minimum legal requirements where reasonably practicable.

PCBU DUTIES AND CONTRACTOR RESPONSIBILITIES

When KP Group is the PCBU



When operating as the primary PCBU (at our own premises or when controlling a workplace), KP Group Limited will:

- Ensure, so far as is reasonably practicable, the health and safety of workers and others
- Provide and maintain safe systems of work
- Provide adequate facilities and maintain safe work environments
- Provide information, training, instruction, and supervision necessary for health and safety
- Monitor workplace conditions and worker health
- Consult with workers on health and safety matters

When Working Under Another PCBU

- When working as a contractor under another PCBU's control, KP Group Limited will:
- Comply with the principal PCBU's health and safety requirements and site rules
- Coordinate and cooperate with the principal PCBU on health and safety matters
- Provide safe systems of work for our workers within the scope of our control
- Ensure our workers are competent and properly trained
- Report hazards and incidents to the principal PCBU as required
- Consult and coordinate with other PCBUs sharing the workplace
- Maintain our duty of care to our own workers regardless of workplace control arrangements

Officer Due Diligence

Directors and senior managers exercise due diligence by:

- Acquiring and maintaining knowledge of health and safety matters relevant to our operations
- Understanding the hazards and risks associated with machinery operation, chemical handling, and customer site work
- Ensuring appropriate resources and processes are available for our safety-sensitive operations
- Ensuring effective reporting and review systems are in place
- Verifying that information, training, instruction, and supervision are provided to workers
- Ensuring compliance with our duties under the Health and Safety at Work Act

RISK MANAGEMENT

KP Group follows a systematic approach to managing health and safety risks across our operations:

1. Risk Identification

- Regular workplace inspections and hazard identification
- Job safety analyses for high-risk activities



- Incident investigation and analysis
- Worker consultation and feedback
- Pre-work risk assessments

2. Risk Assessment

- Evaluation of likelihood and consequence of identified hazards
- Consideration of existing control measures
- Assessment against legal requirements and standards
- Documentation of risk levels and priorities

Risk Control Measures

We apply the hierarchy of controls to manage identified risks:

1. **Elimination** - removing the hazard completely where possible
2. **Substitution** - replacing with something less hazardous
3. **Isolation** - separating people from the hazard
4. **Engineering Controls** - using equipment or systems to minimise risk
5. **Administrative Controls** - procedures, training, signage
6. **Personal Protective Equipment** - as a final protective measure

Monitoring and Review

- Regular review of control measure effectiveness
- Continuous improvement of our risk management processes
- Adaptation to changing work environments and new information

MANAGEMENT RESPONSIBILITIES

Senior Management

- Demonstrate visible leadership and commitment to health and safety
- Allocate adequate resources for health and safety management
- Set clear expectations and hold managers accountable
- Regularly review health and safety performance
- Ensure compliance with legislative requirements

Site Managers and Supervisors

- Implement and maintain safe systems of work within KP Group's scope of control
- Coordinate with principal PCBUs and other contractors on shared worksites
- Ensure compliance with site-specific safety requirements and KP Group standards
- Provide day-to-day supervision and guidance to KP Group workers
- Conduct regular safety communications and toolbox talks
- Investigate incidents involving KP Group workers and report as required
- Monitor and enforce compliance with applicable safety procedures



- Ensure workers receive appropriate training and information
- Report health and safety issues to senior management and principal PCBU's as appropriate

Health and Safety Manager

- Develop, implement, and maintain health and safety management systems
- Provide expert advice on health and safety matters
- Coordinate training and competency development programs
- Monitor compliance with legal requirements and standards
- Facilitate worker consultation and participation
- Prepare reports for management and regulatory authorities

WORKER RESPONSIBILITIES

All workers have a duty to:

- Take reasonable care for their own health and safety and that of others
- Comply with reasonable instructions regarding health and safety
- Use personal protective equipment as instructed
- Report hazards, incidents, and near misses immediately to their supervisor
- Participate in health and safety consultation processes
- Follow established safe work procedures
- Not misuse or interfere with safety equipment or systems
- Actively contribute to maintaining a safe workplace culture

WORKER PARTICIPATION AND REPRESENTATION

Consultation Requirements

KP Group will consult with workers on:

- Identifying and assessing health and safety risks within our control
- Making decisions about controlling risks in our work activities
- Reviewing control measures for our operations
- Changes that may affect workplace health and safety
- Procedures for resolving health and safety issues

When working under another PCBU: KP Group will participate in the principal PCBU's consultation processes and ensure our workers' views are represented in workplace health and safety decisions that affect them.

Health and Safety Representatives (HSRs)

Workers have the right to:



- Request the establishment of a Health and Safety Representative role
- Elect HSRs through a democratic process
- Have HSRs represent them in health and safety matters
- Receive support and training for elected HSRs

Health and Safety Committee

- Minimum of four meetings per year with Directors
- Regular worker participation in safety discussions
- Review of safety performance and improvement initiatives
- Development of safety policies and procedures

TRAINING AND COMPETENCY

Induction Training

All new workers receive comprehensive health and safety induction covering:

- Company safety policies and procedures
- Workplace hazards and risks specific to their role
- Emergency procedures and evacuation plans
- Incident and hazard reporting requirements
- Personal protective equipment requirements and use

Ongoing Training

- Regular refresher training on safety procedures
- Job-specific safety training for high-risk activities
- Supervisor and manager safety leadership training
- Emergency response and first aid training
- Competency assessments for safety-critical roles

Training Records

- All training is documented and records maintained
- Training effectiveness is monitored and evaluated
- Refresher training schedules are maintained

INCIDENT MANAGEMENT

Immediate Response

- Ensure safety of all persons at the scene
- Provide first aid and emergency medical treatment
- Secure the area and preserve evidence
- Notify emergency services if required

Reporting Requirements



When KP Group is the PCBU: Immediate notification to WorkSafe for notifiable events, 24-hour written notice for serious injuries, illnesses, or dangerous occurrences

When working under another PCBU: Immediate notification to the principal PCBU who has primary notification responsibilities to WorkSafe

In all cases: Internal incident reporting within 2 hours to KP Group management

All incidents, near misses, and hazards involving KP Group workers to be reported regardless of severity

Investigation Process

- Systematic investigation of all incidents
- Root cause analysis to identify underlying factors
- Development of corrective and preventive actions
- Communication of lessons learned
- Monitoring of corrective action implementation

CONTRACTOR AND VISITOR MANAGEMENT

Contractor Requirements

- Pre-qualification safety assessment
- Site-specific safety induction
- Compliance with KP Group safety standards
- Regular monitoring and performance review
- Incident reporting and investigation

Visitor Safety

- Safety briefing for all visitors
- Supervised access to work areas
- Provision of appropriate personal protective equipment
- Clear identification and escort procedures

EMERGENCY PREPAREDNESS

Emergency Procedures

- Documented emergency response procedures for all sites
- Regular emergency drills and training
- Emergency equipment maintenance and testing
- Clear evacuation procedures and assembly points
- Communication systems for emergency situations

Business Continuity

- Plans for maintaining critical operations during emergencies



- Regular review and testing of business continuity plans
- Recovery procedures following incidents

RETURN TO WORK PROGRAM

KP Group is committed to supporting injured workers through:

- Early intervention and medical treatment
- Suitable duties programs where appropriate
- Regular communication and support
- Coordination with healthcare providers and ACC
- Monitoring of return to work progress
- Prevention of re-injury through modified duties

ALCOHOL AND DRUG MANAGEMENT

KP Group maintains a comprehensive Drug and Alcohol Policy that includes:

- Clear standards for fitness for duty
- Testing procedures for safety-sensitive positions
- Support programs for workers with substance abuse issues
- Rehabilitation and return to work assistance

PERFORMANCE MONITORING

Key Performance Indicators

- Lost Time Injury Frequency Rate (LTIFR)
- Total Recordable Injury Frequency Rate (TRIFR)
- Near miss reporting rates
- Safety training completion rates
- Safety audit and inspection results
- Worker safety perception surveys

Regular Reviews

- Monthly safety performance reports
- Quarterly management reviews
- Annual policy and system reviews
- Continuous improvement initiatives

CONTINUOUS IMPROVEMENT

KP Group is committed to:

- Regular evaluation of safety management system effectiveness



- Implementation of best practices from industry
- Investment in new safety technologies and equipment
- Learning from incidents and industry experience
- Setting and achieving progressive safety targets

COMMUNICATION

This policy and related procedures will be:

- Communicated to all workers during induction
- Readily available to all workers and contractors
- Reviewed regularly in team meetings
- Updated as required and re-communicated
- Made available to interested parties upon request

POLICY REVIEW

This policy will be reviewed:

- Every two years by senior management as a minimum
- Following significant incidents, near misses, or workplace fatalities
- When health and safety legislation or standards change
- When there are significant organizational or operational changes
- When performance monitoring indicates the need for review
- Based on recommendations from WorkSafe or other regulatory authorities

The review process will include consultation with workers and their representatives to ensure the policy remains effective and relevant to our operations.

COMMITMENT STATEMENT

KP Group Limited commits to implementing this policy through allocation of appropriate resources, clear accountability, regular monitoring, and continuous improvement. Health and safety performance is a key criterion in all management performance reviews.

KP Group Director: Sam Pemberton

A handwritten signature in black ink, consisting of the letters 'S' and 'P' in a stylized, cursive font.

Date: 14/07/25

Review Date: 14/07/27



Version: 8.0

This policy demonstrates KP Group Limited's commitment to providing a safe and healthy workplace for all workers and others who may be affected by our operations. It will be implemented through our comprehensive health and safety management system and supported by detailed procedures and work instructions.