



# Industrial Relations Policy – Engineering Building & Infrastructure Pty Ltd (EBNI)

## Purpose

EBNI is committed to integrating our Quality Management System (QMS, ISO 9001:2015) with proactive Work Health and Safety (WHS) practices to protect our people and processes. This policy establishes a framework to meet applicable WHS legislation (including the model *Work Health and Safety Act 2011* and Regulations across all jurisdictions) while maintaining the ISO 9001:2015 emphasis on customer satisfaction, process control, risk-based thinking, and continual improvement. We aim to foster a culture where safety and quality reinforce each other – identifying hazards early, consulting with workers, and continuously improving safety and quality outcomes across all projects.

## Scope

This policy applies to all EBNI operations in every Australian state and territory. It covers all EBNI employees (permanent, casual, and temporary), contractors, consultants, subcontractors, visitors and any other persons affected by our work activities. It governs project sites, offices, workshops, and any locations where EBNI has operational control. All personnel are expected to understand and apply this policy in their daily activities. Compliance with this policy is mandatory and forms part of contractual and employment obligations.

## Legislative Framework

EBNI's industrial relations and safety practices comply with relevant national and jurisdictional laws, regulations, and codes of practice, including (but not limited to): the **Work Health and Safety Act 2011** and **Regulations 2011** (model WHS laws as adopted by states/territories); the *Workers' Compensation and Rehabilitation* or *Workplace Injury Management* Acts applicable in each state (e.g. *Workplace Injury Management and Workers Compensation Act 1998* (NSW)); and Safe Work Australia model Codes of Practice (e.g. the **WHS Consultation, Cooperation and Coordination Code of Practice 2011**). Where state or territory laws differ (e.g. Victoria's Occupational Health and Safety Act, or Western Australia's Workers Compensation and Injury Management Act 1981), EBNI will meet or exceed those requirements. Relevant legislation obligations include the duty to consult, the requirement to provide a safe work environment, and workers' compensation obligations. This policy also aligns with ISO 9001:2015 requirements for meeting legal and customer requirements, effective process control, and continual improvement.

## Policy Statement

EBNI's management and workforce will work cooperatively to ensure high standards of quality and safety. We are committed to:

- **Health and Safety Primacy:** Placing WHS as a primary focus in decision-making. We will identify, assess and control risks to health and safety in accordance with legislation. Employees and contractors must follow safe work procedures, report hazards immediately, and use appropriate personal protective equipment. By drawing on worker knowledge, we make more informed risk-control decisions.
- **Consultation and Participation:** Ensuring meaningful consultation with workers on all safety matters. Consultation (e.g. through toolbox talks, meetings, HSRs or committees) is a legal requirement under the WHS Act. We will share information, give workers a reasonable opportunity to express views, and consider those views before decisions are made.
- **Quality Management Integration:** Applying ISO 9001:2015 principles to safety. EBNI will use risk-based thinking to proactively safeguard people and processes. We will consistently meet customer and regulatory requirements while eliminating waste and preventing errors. Through continual improvement cycles, we will monitor safety and quality metrics and implement corrective actions as needed.
- **Resource Commitment:** Providing adequate resources (time, training, equipment and personnel) so that quality and safety objectives are met. Top management (officers) will ensure systems are in place and reviewed regularly. Workers will be trained and informed in safety and quality procedures, and provided with proper tools and facilities to work safely.
- **Accountability and Responsibility:** All levels of management and staff share responsibility for a safe and compliant workplace. Managers will enforce this policy, monitor performance, and take corrective action on any non-conformance.

## Consultation Procedures

EBNI will implement structured consultation arrangements to involve employees, contractors and consultants in WHS and industrial relations matters. Consultation may include:

- **Health and Safety Representatives (HSRs):** Where applicable, workers may elect HSRs. EBNI will facilitate elections and fully involve HSRs in risk assessments, inspections, incident investigations, and meetings with Management.
- **Health and Safety Committees:** Committees will be established on larger projects to regularly review safety reports and proposed changes. The Project Manager, Site Manager, WHS Coordinator and elected representatives will meet (e.g., monthly) to discuss hazards and controls.
- **Toolbox Talks and Meetings:** Daily or weekly pre-start meetings and toolbox talks will be held on-site to communicate hazards, review incidents, and gather worker input on safety controls (short discussions focused on specific WHS topics). Other formal meetings (e.g. project start meetings, subcontractor inductions, and tender briefings) will include safety agenda items.
- **Communication Methods:** Information will be shared via signs, bulletins, emails or noticeboards. EBNI will encourage an open-door policy so workers can raise issues informally any time. Workers will be trained to identify hazards and encouraged to ask questions, raise

concerns, and suggest improvements.

- **Consultation Procedures Document:** EBNI will agree on documented consultation procedures with workers, outlining *what* issues to consult on (hazards, risk controls, change proposals, training, etc.), *who* will participate, *how* (meetings, HSRs, toolbox talks, surveys), *communication methods*, and *review processes*. These procedures will be regularly reviewed for effectiveness.
- The work health and safety act 2011 number 10 states the following in respect of consultation on site:
  - Section 48 nature of consultation:

Consultation under the division requires That relevant information about the matter is shared with workers and That workers be given a reasonable opportunity:

1. To express the views and to raise work health and safety issues in relation to the matter and
2. To contribute to the decision-making process relating to the matter and
3. That the views of workers are taken into account by the person conducting the business or undertaking and
4. That the workers consulted our advised of the outcome of the consultation in a timely manner

If the workers are represented by your health and safety representative, the Construction must involve that representative in Section 49 when consultation is required. Consultation under the division is required in relation to the following health and safety matters:

- A. When identifying hazards and assessing risks to health and safety arising from the work carried out or
- B. To be carried out by the business or undertaking When making decisions about ways to eliminate or minimise those risks:
  - a. When making decision decisions about the adequate of facilities for the welfare workers
  - b. When proposing change changes that may affect the health or safety of workers
  - c. When making decision decisions about the procedure for
    - i. Consulting with worker or Resolving work health and safety issues at the place or Monitoring the health of workers or
    - ii. Monitoring the conditions at any place under the management or control of the person conducting the business or undertaking or
    - iii. Providing information and training for workers or
    - iv. When carrying out any other activities described by the regulations for the purpose of this section, the person conducting the business or undertaking must ensure compliance.

Agreed procedures will specify that consultation is two-way: we will *share relevant information* (including policies, risk assessments, and incident reports) and allow workers reasonable opportunity to give input before finalizing decisions. Any worker (or their representative) can raise a WHS concern at any time, and outcomes of consultations will be communicated back to all parties promptly.

# Responsibilities

EBNI's safety and quality culture relies on clear allocation of roles and responsibilities:

- **Officers/Senior Management:** Ensure EBNI complies with WHS laws and ISO 9001. Allocate resources for safety (training, PPE, safe systems) and review WHS performance regularly. Set the tone for consultation and accountability.
- **Project Managers:** Plan projects incorporating QMS and WHS requirements. Ensure job safety analyses, legal compliance checks, and client quality specifications are met. Approve risk control plans and allocate budget for quality/safety measures. Engage clients and regulators as needed.
- **Site/Construction Managers:** Oversee day-to-day site operations. Implement risk controls (safe systems, signage, inspections), enforce PPE and site rules, and ensure workers understand procedures. Conduct regular toolbox talks and site inspections, and consult with HSRs or team members. Please promptly report any safety breaches or quality defects to management.
- **WHS Coordinator/Advisor:** Maintain the WHS management system, conduct safety audits, investigations and training. Update risk registers and policy documents. Assist in incident investigations, and monitor legislative changes. Serve as a resource for managers and workers on compliance and safe work practices.
- **Supervisors/Foremen:** Directly manage crews, ensure tasks are done safely and correctly. Identify hazards in their area and report them. Mentor workers on correct procedures and encourage reporting of near misses. Participate in toolbox talks and ensure feedback flows to management.
- **Workers, contractors, and consultants:** take reasonable care for their own health and safety, as well as that of others. Follow safe work procedures, use provided safety equipment, and complete any required training. Immediately report any hazards, incidents, or concerns to their supervisor, HSR, or site manager. Cooperate with EBNI in investigations and training. This includes subcontractors and consultants on site, who must also comply with this policy and co-ordinate with EBNI on safety matters.
- **HSRs and Committee Members:** Communicate safety concerns of their workgroup to management. Inspect work areas, attend WHS meetings, and assist in incident investigations. Provide feedback from consultations to their co-workers.

Each individual is expected to perform their duties in accordance with this policy and related procedures. Non-compliance may lead to corrective action under EBNI's disciplinary procedures.

## Issue Resolution

All health-, safety-, or workplace-related issues will be addressed through a clear reporting and resolution process. The steps include:

- **Hazard Identification:** Workers are trained to identify hazards (e.g. unsafe equipment, environment, and methods). Regular inspections and risk assessments will be carried out to find hazards. Employees are encouraged to report hazards or unsafe acts when identified.
- **Reporting:** EBNI provides accessible reporting channels. Workers should report incidents or hazards immediately to their supervisor, site manager, or HSR. The reporting can be done verbally at the moment, by email, or via a formal incident report form. A register of all incidents and near misses will be maintained and reviewed. Serious incidents (fatality, serious injury, etc.) will be notified to regulators as required by law.
- **Investigation:** The appointed safety officer (or Project Manager) will promptly investigate each report to determine the cause. This may involve interviewing witnesses, examining equipment, and reviewing procedures. Investigations will identify what went wrong or could go wrong, including any new hazards or control failures.
- **Corrective Actions:** Based on the investigation, EBNI will implement effective control measures to eliminate or mitigate the hazard. This may include engineering fixes, additional training, revising procedures, or other measures. Actions will be prioritized by risk and urgency.
- **Communication:** The outcome of the investigation and actions taken will be communicated to the person who reported the issue and, where relevant, to all workers and HSRs involved. Feedback loops guarantee that workers understand the seriousness and resolution of their concerns.
- **Review and Improvement:** All incidents and hazard reports will be analyzed for trends. Lessons learned will feed back into risk management and the QMS. Safety and quality procedures will be reviewed and updated as part of EBNI's continual improvement process. Regular management reviews will assess WHS and QMS performance data (incident rates, audit findings, client feedback) to drive further improvements.

EBNI will also coordinate with other duty holders (e.g., principal contractors or subcontractors) to resolve shared safety issues, following the cooperation and coordination provisions of WHS law. All parties are expected to respond to reasonable requests and assist in resolving joint WHS matters.

By diligently identifying risks, consulting proactively, and acting decisively on issues, EBNI aligns its industrial relations practices with both ISO 9001:2015 and WHS obligations, creating a safer, higher quality workplace for everyone.

**Approved by:** Managing Director, EBNI Pty Ltd

**Date:** February 09, 2026