

EHS MANUAL

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QHSE PROCEDURE

Viking Industrial

Approval and revision status

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1 Introduction

1.1 Overview

This document discusses potential impacts on the environment and heritage across the Plant. This includes contamination, damage to flora and fauna, fire, noise, soil damage and erosion, greenhouse gas emission, bio-diversity, feral animals and water quality and how Viking Industrial will manage those risks.

This documents also outlines how Viking Industrial will manage the National Heritage List, Commonwealth Heritage List, Register of the National Estate and sites that are thought to have heritage significance but have not been formally assessed, (sites can have Historic, Indigenous and Natural heritage values) over the course of the contract.

1.2 Purpose

The purpose of this Preliminary Environmental Management Plan (EMP) is to ensure that Viking Industrial and all associated employees are subcontractors comply with the following:

- All statutory requirements and other requirements of clients environmental management.
- Any Client Quality Management System.
- All requirements of Environmental Legislation including (but not limited to) the Environmental Protection and Biodiversity Conservation Act 1999 and associated Environmental Protection Acts and Regulations administered by the Western Australian Government.

1.3 Scope of works

The scope of works includes but not limited to:

- **Mobilisation**
 - Obtain Inductions for required personal
 - Complete the Risk Assessment
 - Commence with Stakeholder Engagement
 - Finalise a Detailed Construction Schedule as per the Gantt chart
 - Isolations Plans formalised
 - Obtain appropriate Permits
 - Environmental Management Plan confirmed
 - SDS Register established
 - Safety and Health Management System
- **Site Establishment**
 - Secure the Site
 - Provision of amenities for workers
 - Provision of security for equipment
 - Establish First Aid and Emergency Systems
 - Check for dangerous goods or hazardous substances.
 - Check for soil contamination
 - Identify the locations of any underground services.
 - Check for live electrical wiring.
 - Ensure correct sign postage is installed
 - Registers and Forms to be established on site
 - Site Induction Program

- **Civil works**
- **Foundations**
- **Fencing**
- **Drainage**
- **Earthing**
- **Lighting**
- **Fire Systems**
- **Signage**
- **Fuel system certification**
- **LV certification**
- **HV certification**
- **Test and Commission Final Clean**
- **Energisation**

2 Management Commitment and Accountability

2.1 Intent

To ensure that all Viking Industrial managers provide a visible, proactive and demonstrated commitment to environmental management and that the responsibility and authority of all Viking Industrial personnel is clearly identified, defined, documented and signed off.

This Preliminary Environmental Management Plan has at its foundation the Environmental Policy endorsed by the Viking Industrial Managing Director to assure personnel across the business of Viking Industrial commitment to the following issues affecting them, their families and the communities in which we operate.

Signed copies of all Viking Industrial QHSE policies shall be displayed in all common areas of branches.

2.2 Organisational Structure

Each project has appointed Client and support personnel allocated specific tasks, responsibilities and accountabilities defined in their position descriptions, separate to these documented accountabilities is the following requirements placed upon each manager:

- As a minimum, compliance with all relevant Federal and Territory environmental legislation and best practice guidelines
 - Establishing and maintaining an Environmental Management System which complies with ISO 14001
 - Setting realistic and measurable environmental objectives and targets for company personnel to achieve and review their performance against those objectives and targets annually;
 - Hold each employee responsible and accountable for their environment performance;
 - Strive to prevent pollution, reduce waste and commit to recovery and recycling where possible;

- Educate and train all employees and subcontractors on key environmental issues, management controls and associated responsibilities;
- Undertaking regular audits and inspections of our workplace and identify and implement opportunities for improvement.

To ensure that the accountabilities placed on senior personnel across Viking Industrial are met, annual discussions are held with each person's direct reports. These performance reviews include the measuring of positive performance indicators against each senior person within their areas of accountability. These positive performance indicators include but are not limited to achieving their designated no of "Take 5's" and having all scheduled inspections carried out by the due dates.

Each level throughout the organisation has specific environmental responsibilities as outlined below:

2.3 **Responsibilities**

Everyone is responsible for their every action or inaction at the workplace. The duties of all personnel while at work are:

- Observe their "Duty of Care"
- Know and work in accordance with this Preliminary EMP
- Ensure that the environment is not put at risk by their own actions or in-actions
- Cooperate with the employer or any other person with duties relating to environmental management
- Not to interfere with or misuse anything provided for environmental management

a. Management

- Prepare, authorise and display the Environmental Policy & Objectives
- Ensure the Environmental Management Plan is regularly audited and suitable actions taken in the event of non-compliance
- Provide support services to site
- Identify areas of best practice as part of a continuous improvement approach to improving the environmental management system

b. Site Management

- Prepare, submit and have approved this EMP
- Ensure work is conducted in accordance with the approved EMP
- Apply for and gain approval of the required Environmental Clearance Certificate
- Provide competent supervision and ongoing support to the project team
- Comply with Safe (SWMS) and Standard Operating Procedures (SOP)
- Ensure ongoing compliance to Legislation
- Implementation of plan / change management as required

c. Employees

- Know and work in accordance with this EMP
- Advise the Client immediately of environmental incidents and/or near misses in the work area

- Work in a manner that will not endanger themselves, others, or the environment
- Assist new site personnel in recognising and managing environmental hazards and risks

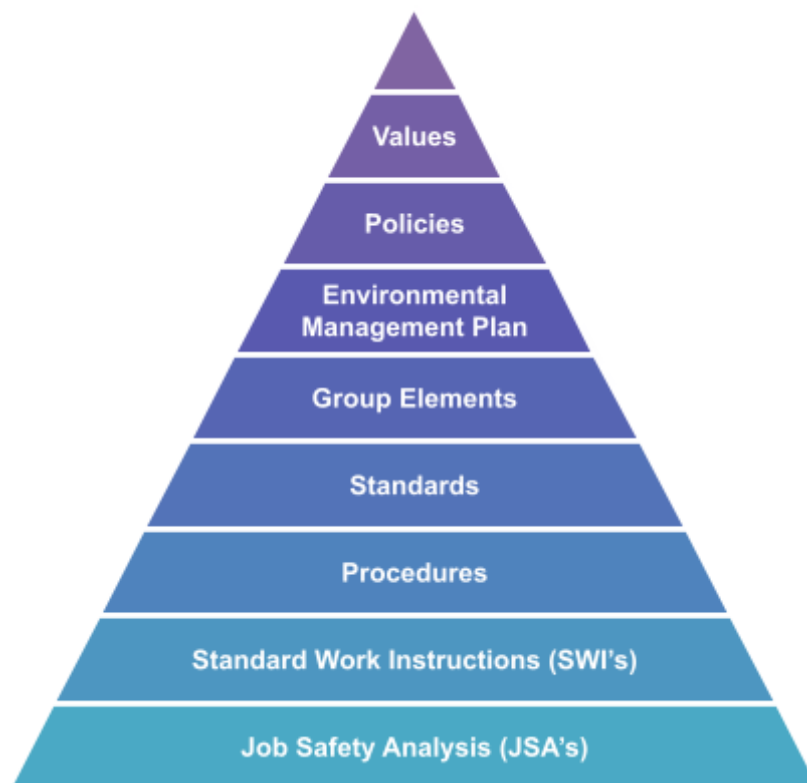
d. Contractors, Suppliers, Client Personnel

- As mutually agreed with Viking Industrial to adhere to this EMP.
- Co-operate in implementing and monitoring the EMP on site.
- Enforce compliance with environmental procedures by their employees.
- Ensure personnel understand and accept their responsibilities as listed in this EMP.
- Lodge Environmental Management Plans and/or Work Method Statements, if requested by Viking Industrial, before commencement of their work on site
- Complete all relevant documentation as required and participate where requested in environmental inspections

2.4 Environmental Management System Document Structure

The Preliminary Environmental Management System is hierarchical, where documents and systems must meet and support the requirements of those of higher levels.

This is best described by the following illustrations:



3 Legal Compliance and Document Control

3.1 Intent

To ensure that all relevant laws, acts, regulations, standards, codes, statutory licences and other legislative requirements are identified, accessible, understood and complied with, and an effective document control system is in place.

Viking Industrial intranet for site operations to retrieve documents. This system has been developed by internal personnel with the skills and knowhow to offer 24 hour support to the operations if the system malfunctions for any reason.

It is the document controller’s responsibility to ensure only approved documents are made available via the Viking Industrial Intranet. The document process is governed by reference 2.0 document control Viking Industrial Safety and Health Management System and approved by our managing director.

3.3 **Records and Records Management**

Records that show compliance and/or the extent to which planned objectives and targets have been met shall be identified. Records included in this classification are:

- Training, induction attendance records
- Toolbox talks attendance records
- Work permits
- Electrical testing and inspection reports
- Environmental risk management reports (e.g. JSA, Risk Assessments)
- Internal audit and Management review reports
- Plant, vehicle and equipment inspection reports
- Construction environmental inspections
- Take 5 records.
- Mechanical testing and inspection reports

3.4 **Legal Compliance**

Viking Industrial regularly receive information relating to updates of relevant act and regulations effecting our operations, this is utilised to update our system documents to allow us to maintain legal compliance.

This information is then written into site-specific documents to ensure that the operations are in-compliance with their state’s relevant legal obligations and responsibilities.

The legislative requirements set out in the following acts and regulations are in-corporated into our system documents:

This section lists various Commonwealth environmental legal obligations relevant to the project.

| Legislation | Aspect | Purpose |
|-------------|--------|---------|
|-------------|--------|---------|

| | | |
|--|---|---|
| <p><i>Environment Protection and Biodiversity Act 1999</i></p> | <p><i>Environmental Protection/ Approvals</i></p> | <ul style="list-style-type: none"> • Provide for the protection of the environment, especially matters of national environmental significance • Conserve Australian biodiversity • Provide a streamlined national environmental assessment and approvals process • Improve the protection and management of important natural and cultural places • Control the international movement of wildlife, wildlife specimens and products made or derived from wildlife, and • Promote ecologically sustainable development through the conservation and ecologically sustainable use of natural resources. |
|--|---|---|

3.5 Objectives

The project objectives with respect to Environmental Management are consistent with our Environmental Policy and are listed below:

- (a) Complying with all the requirements imposed by the all applicable environmental, cultural and heritage legislation
- (b) Consulting openly with the RTA Contract Administrator, relevant governments and local departments.
- (c) Be responsive to constructive inputs from affected and interested stakeholders in relation to all environmental matters

3.6 Targets

Specific targets for personnel with respect to environmental management are:

- The Environmental Management Plan to be reviewed and approved by the project Administrator prior to commencement of construction activities
- Zero Environmental offences committed for the duration of the Project

4 Risk and Change Management

4.1 Intent

To ensure that all hazards to the environment are identified, the risks associated with these hazards are assessed, documented and managed. All new or proposed changes to processes, products or services are assessed for potential risks and managed to ensure operational performance is maintained at an acceptable level.

4.2 Pre-Construction Risk Management

An integral part of the planning process for the project is the early and then ongoing identification of risk and hazards associated with construction activities undertaken on site, as well as the assessment of associated risk and the instigation of appropriate controls.

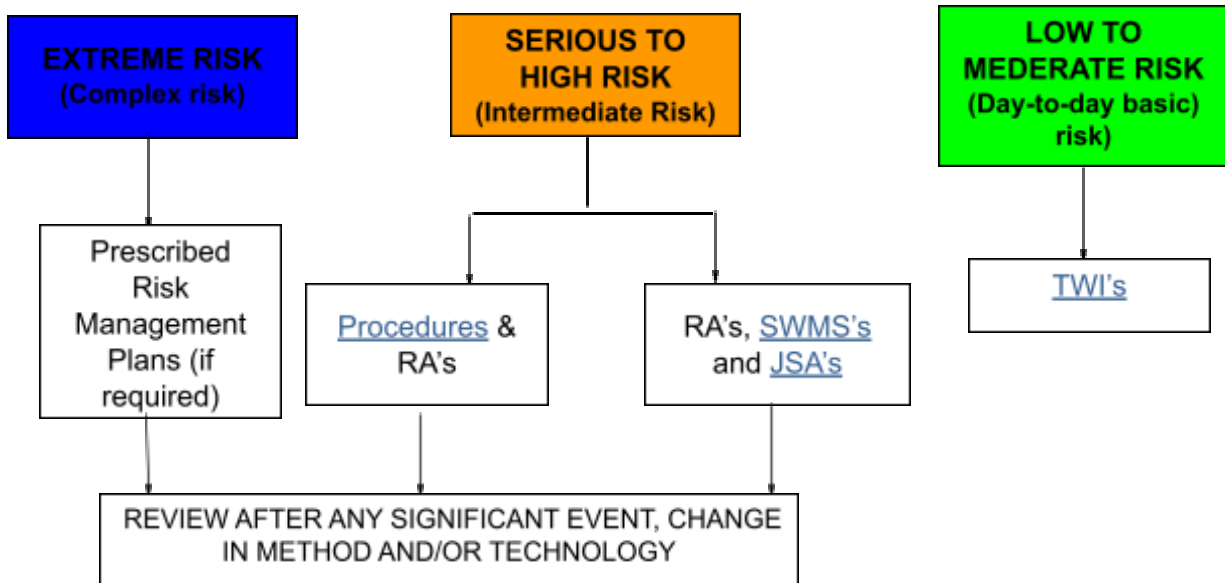
4.3 Project Risk Management Processes

Viking Industrial Safety, Health and Environmental management system includes specific detail on how the business intends to reduce risk across its operations; the processes utilised

Made available on request. All controls put in place to manage the risks identified follow the hierarchy of controls as detailed below:

- Elimination
- Substitution
- Engineering controls
- Administrative controls
- Utilisation of PPE.

The following is an illustration of the risk management process and tools used at Viking Industrial:



Viking Industrial have a procedure outlining the specific risk assessment process utilised across the business. These risk assessments and closeout details can also be made available to the relevant on request.

The following environmental issues are an example to the nature of work proposed. The Client Manager and Fitter Officer must continually monitor and control these and other relevant issues:

- Exhaust omissions
- Erosion of disturbed soil and ground by rainwater run-off.
- Fuel and/or oil leaks from vehicles or minor fuel/lube storage, and equipment.
- Rubbish (eg. discarded materials, containers, wrapping, packing, wire, etc).
- Plant noise emission.
- Damage to roads, tracks.
- Damage to vegetation, trees, paddocks, fences, contour banks, etc.

- (h) Damage or interference to historical or indigenous sites.
- (i) All electrical hazards associated with the proposed Client

The Construction Manager shall, in accordance with procedure *Risk Management*, ensure all task hazards are identified and assessed for risk to the work site, urban and/or natural environment.

During the project, the Client Manager and Site Fitter will ensure critical work activities are adequately controlled. That is, those tasks and activities where failure may result in:

- (a) High pollution risk.
- (b) Adverse impact on the urban or natural environment.
- (c) Breach of contract requirements.
- (d) Prosecution under statutory legislative requirements.
- (e) Damage to property.

Below is a table that outlines potential events and the consequences.

| SEVERE | MAJOR | MODERATE | MINOR | NEGLIGIBLE |
|---|---|---|--|---|
| Irreversible and extensive: * Damage to any matter protected under the EPBC Act; * Damage to values of a place on a National or Commonwealth Heritage list or an indigenous heritage site; * Degradation of air, land or water environments; or * Loss of biodiversity. Production of waste or consumption of resources over 100% more than set targets. | Extensive and reversible, in more than 2 years, or irreversible and localized: * Damage to any matter protected under the EPBC Act; * Damage to the values of a place on a National or Commonwealth Heritage list or an indigenous heritage site; * Degradation of air, land or water environments; or * Loss of biodiversity. Production of waste or consumption of resources up to 100% more than set targets. | Localized and reversible, in less than 2 years, or irreversible and immediate: * Damage to any matter protected under the EPBC Act; * Damage to the values of a place on a National or Commonwealth Heritage list or an indigenous heritage site; * Degradation of air, land or water environments; or * Loss of biodiversity. Production of waste or consumption of resources around 50% more than set targets. | Localised and reversible, in less than 6 months, or immediate and reversible: * Damage to any matter protected under the EPBC Act; * Damage to the values of a place on a National or Commonwealth Heritage list or an indigenous heritage site; * Degradation of air, land or water environments; or * Loss of biodiversity. Production of waste or consumption of resources around 20% more than set targets. | Immediate and reversible, in less than a month: * Damage to any matter protected under the EPBC Act; * Damage to the values of a place on a National or Commonwealth Heritage list or an indigenous heritage site; * Degradation of air, land or water environments; or * Loss of biodiversity. |

4.4 Diesel Powered Plant

The Client Manager shall ensure that diesel powered plant and vehicles under their control are used, handled and maintained to a standard that minimises adverse impact on the environment. This will include:

- (a) Maintaining engine systems (particularly diesel) to minimise exhaust smoke emission
- (b) The temporary storage of bulk fuel or lubricants on a work site shall be within a bunded area or similarly protective manner.
- (c) Unwanted fuel/oil or contaminated soil will be removed at the end of the job and disposed in accordance with EPA or local government guidelines.

4.5 **Sedimentation and Erosion Control**

The Construction Manager shall ensure that any work that disturbs soil or ground will be undertaken in a manner that minimises sediment run-off and/or erosion. This will include surveillance of any job with potential for sedimentation and/or erosion during wet weather and an end of job inspection to ensure any required control measures are in place as specified.

5 Training and Competency

5.1 Intent

To ensure all Viking Industrial employees, subcontractors and visitors are aware of environmental requirements and behave in a responsible manner, a system is in place where all persons coming to site (to work) are taken through a comprehensive induction process.

Persons visiting site, but not intending to work while there, are captured in the visitor induction register in place to ensure visitors are not exposed to any unacceptable level of risk. All visitors are at all times accompanied by an experienced and fully inducted person when entering a hazardous area.

All plant operators are required to be trained, deemed competent and authorised to operate equipment. This supports the safe operation of equipment and ensures that the operation in general is not exposed to an increase in risk due to unskilled personnel operating on site.

6 Management Procedures

1.1 Aboriginal and Non-Aboriginal Cultural Heritage Sites and Values

In accordance with the *Heritage Act 2011*, it is an offence to disturb or damage any items discovered during project works that may have cultural heritage significance.

Objectives

Minimise impact on items / places of heritage or archaeological significance

Responsibility

The Client Manager is responsible for ensuring appropriate management actions are taken to minimise impact on cultural heritage values. It is the responsibility of all employees and contractors to report the discovery of any artefacts, Aboriginal relics or places and cease work until the matter has been addressed.

Management Procedures

| Action | Management Procedures |
|--|---|
| Unexpected location of an object of Aboriginal or cultural heritage significance | If any person believes that they have discovered or uncovered Aboriginal cultural heritage materials, the individual should notify any machinery operators that are working in the general vicinity of the area that earth disturbance works should stop immediately. Remember health and safety requirements when approaching machinery operators. |

| Action | Management Procedures |
|----------------------------|---|
| | A buffer protection zone of 10m x 10m should be established around the suspected cultural heritage site or items. No unauthorised entry or earth disturbance will be allowed within this 'archaeological zone' until such time as the suspected cultural heritage items have been assessed, and appropriate mitigation measures have been carried out. |
| | <p>The <i>Aboriginal Heritage Act 1972</i> requires a person who discovers an archaeological place or object is to report its existence to the Registrar, or to a police officer, by completing and submitting the Heritage Information Submission Form - https://forms.business.gov.au/smartforms/wa-daa-hcb/heritage-information-submission/</p> <ul style="list-style-type: none"> • A description of the place or object • Its location • The persons name and address • If know by the person, - the name and address of the owner/occupier of the place or the place where the object is located |
| Discovery of human remains | Under no circumstances should the suspected skeletal remains be touched or disturbed. If these are human remains, then this area potentially is a crime scene. Tampering with a crime scene is a criminal offence. |
| | Any person discovering suspected skeletal remains should notify machinery operators that are working in the general vicinity of the area that earth disturbing works should stop immediately. Remember health and safety requirements when approaching machinery operators. |
| | A buffer protection zone of 50m x 50m will be established around the suspected skeletal remains. No unauthorised entry or earth disturbance will be allowed with this buffer zone until such time as the suspected skeletal remains have been assessed. |
| | Relevant authorities (police) will be contacted and informed of the discovery. |

Monitoring

Continuous monitoring will occur throughout our involvement of this project.

1.2 Fuels, Oils and Chemicals

Fuels and chemicals may be stored on site or used during the contract. These are generally toxic to plants and animals, and if spilt near surface waters or drains may cause widespread pollution. Chemicals and fuels should be located away from drainage lines, stormwater inlets, waterways, areas of significant flora and fauna and other sensitive areas. When siting chemical and fuel storage areas, the slope of the site and the potential flow pathways to sensitive areas should be taken into account.

Objectives

- No release of chemicals or fuel to the environment.
- Prompt clean-up of any spills of liquid or solid materials.

Responsibility

The Client Manager shall be responsible for ensuring that all necessary works and equipment are in place and resources are made available to maintain the facilities and equipment in good working order.

Management Procedures

| | |
|------------------|---|
| Spill management | present on site. A spill kit is to be located within 10m from fuel and chemical storage areas and refuelling areas. |
| | Personnel on site shall be appropriately trained to attend to a spill. |
| | Spills will be managed in accordance with the Work Instruction Environmental Damage Spill response |

Monitoring

Fuel and chemical storage areas should be inspected at least weekly to ensure there are no spills, any waste storage drums are in good condition, all materials are being stored in bunded areas and bund drain valves are locked closed.

Contingency Measures

Any spills shall be managed in accordance with a Work Instruction Environmental Damage Spill response.

The Client Manager will be advised of any non-conformances identified through monitoring, such as damaged drums or inappropriately stored materials, and an appropriate person assigned to rectify the non-conformance.

1.3 Waste Management

Construction works may generate a variety of waste streams, including: scrap construction materials such as timber, steel, wire, cable, packaging and domestic wastes. Mismanagement of this waste can lead to pollution of air, water and soils, and loss of land due to land-filling.

Objectives

- Minimise generation of waste
- Appropriate containment and disposal of wastes

Responsibility

The Client Manager is responsible for ensuring compliance with this procedure and all relevant legislation.

Management Procedures

| Action | Management Procedures |
|----------------------|---|
| Storage and Handling | Where possible, materials should be purchased in reusable containers or packaging. |
| | All waste material generated in the workplace or in the field should be placed in secure and correctly labelled containers. |
| | General waste and scrap metal shall be stored separately. |
| | Filled waste containers should not be stored in the workplace. Once filled, the containers should be transported directly to a bunded storage area. |

| Action | Management Procedures |
|--------|--|
| | Wastes should not be allowed to stockpile in storage areas. Once sufficient wastes have been generated to warrant removal, wastes should be removed. |
| | Where possible wastes should be recycled or reused on site |
| | Domestic rubbish must be effectively contained and disposed of |
| | Waste and recycling bins must be provided, and all rubbish removed on at least a weekly basis. |

Monitoring

A daily site inspection will be undertaken to ensure waste is being appropriately managed and contained and that litter is not migrating off-site. Litter originating on-site will be cleaned up as part of this inspection.

Contingency Measures

A review of waste management procedures and controls will be undertaken as deemed necessary from monitoring/inspections.

1.4 Management of Pests and Weeds

Vehicles and any machinery entering the project site must be clean and free of weed/seed or mud materials. Given vehicles will be required to travel through the approved access roads within the site this aspect will be carefully managed.

Objectives

- Prevent deposition of soils on site and public roads
- Prevent potential spread of pest plants and soil disease
- Minimise impacts to surface water bodies

Responsibility

Implementation of this procedure is the responsibility of the Client Manager.

Management Procedures

| Action | Management Procedures |
|------------------------|--|
| Control of pest plants | Areas of weed infestation are to be identified. Field crew and contractors are to avoid driving through weed infested areas where possible. |
| | Clothing, footwear, vehicles, plant and equipment must be clean and free of seed before entering the site |
| | If required, vehicle wheels/under bodies must be washed before entering/leaving site |
| | All vehicles and equipment must be cleaned before moving from weed infested to weed free areas. Truck wash facilities used should only be those that comply with EPA requirements. |
| | Vehicles should only be washed in a designated bunded area where waste is collected, treated and disposed of in a proper manner. |
| | Detergents shall not be used to wash vehicles, as they emulsify oil and grease, unless the vehicle wash facility is connected into the sewerage system. |
| | Vehicles must be washed in a manner to ensure all soil and vegetation is removed from the wheel arch, mud flaps, tyres, and under body of the vehicle. |

| | |
|--|--|
| | Mobile vehicle washing kits are to be used before leaving weed infested areas or travelling between sites. |
| | Vehicle washing area shall be located away from watercourses and drains. |

Monitoring

Regular inspections of the vehicle wash area will be undertaken to ensure compliance with this procedure and appropriate disposal of wastewater.

Adjacent roads will be inspected daily to ensure soil is not being transported off-site.

1.5 Flora and Fauna Management

Construction works have the potential to impact on native and non-native flora and fauna through clearance or trimming of native vegetation and habitat; establishment of new easements; disturbance of habitat; and bird strikes.

Objectives

- No adverse impacts to native and non-native flora or fauna

Responsibility

The Client Manager is responsible for ensuring compliance with this procedure.

Management Procedures

| Action | Management Procedures |
|------------------|---|
| Fauna management | Works shall be carried out to minimise disruption to native animals. Feeding of such animals is prohibited. |
| | Removal of dangerous species from site shall be handled by wildlife rescue services. |
| | Work-site controls such as hygiene, waste management, and fencing will be implemented to ensure animals do not become a pest during construction. |
| | No firearms will be permitted on site. |
| Bird strikes | If there is an elevated risk of bird strikes, overhead cables will be marked with coloured flagging or aircraft marker balls to increase visibility. |
| Flora | <ul style="list-style-type: none"> • Areas of weed infestation are to be identified. Work crews are to avoid driving through weed infested areas where possible. • Disturbance of flora and fauna on the site is to be kept to a minimum and shall only be done if necessary for the construction works, in consultation with the RTA Environmental Officer • If any native fauna is located on site and will interfere with works the Client Manager will be contacted to make necessary arrangements for work to continue. |

Monitoring

Compliance with this procedure will be monitored during regular site inspections and audits.

Areas of protected vegetation will be inspected for any damage every week.

Contingency Measures

Controls and work plans may be revised if necessary to avoid damage to native vegetation, or disturbance of native fauna.

1.6 Noise Management

Excessive and intrusive noise is considered an environmental hazard and must be avoided. The effect of off-site noise from industry or construction sites on nearby properties will depend on the use of the property and the existing background noise. Uses such as residential, schools, hospitals, golf courses are quite sensitive to noise, while other industries, shops and recreational areas may be less sensitive.

Sensitivity to noise levels is also time dependent as background noise levels are generally lower at night, and industrial noise is therefore more pronounced.

Objectives

- Minimise nuisance noise and vibration generated from construction activities.

Responsibility

The Client Manager is responsible for assessing and controlling noise pollution.

Management Procedures

| Action | Management Procedures |
|-----------------|--|
| Noise emissions | Access hours will be strictly adhered to and will not fall outside of the contract listed hours unless otherwise approved by the Contract Administrator. |

Monitoring

Any enquiries will be handled by the Client Manager. If complaints from the client or notices from the EPA about noise are received, the Project Director will be advised immediately. Any complaints received will be entered into a Project Complaints Register. The register will include details of follow up action taken, and whether such action was successful in alleviating the problem.

Contingency Measures

Additional noise control actions may be implemented as deemed necessary through the risk management process or as otherwise directed by the Project Director.

1.7 Air Quality

Works, vehicle movements, and transport of materials may generate dust, particularly if the weather is dry. Excessive dust generation can result in public health impact, be dangerous from a safety viewpoint as it may obscure the vision of vehicle drivers, and may create a visual impact. Dust may settle on adjacent properties and be carried some distance by wind.

Air emissions from vehicles can contribute to local air pollution.

Objectives

- Minimise dust generation and air emissions from Client activities.
- Minimise off-site impacts from dust on local environment and facilities.

Responsibility

The Client Manager will be responsible for ensuring that this procedure is complied with.

All project employees will be responsible for ensuring that their works and associated construction activities do not generate excessive visible dust in the air that gives rise to nuisance dust.

Management Procedures

| | |
|------------------------|---|
| movements | limit of 30 km/hr on all unsealed surfaces including access tracks. |
| Vehicle Emissions | All construction vehicles will be fitted with emissions control devices and comply at all times with the relevant Australian Design Rules for the type and year of vehicle. |
| Construction equipment | Utilise water were possible to minimise dust generation during earthworks activities |

Monitoring

The Client Manager will undertake ongoing visual inspections during dry weather to identify any dust deposits that indicate an off-site impact.

2 Communication and Consultation

2.1 Intent

To ensure effective communication and consultation is maintained with all stakeholders associated with Viking Industrial operations and activities, and that they are encouraged to participate in and commit to operational environmental performance initiatives.

For an active environmental awareness culture to exist within an organisation a number of mechanisms need to be in place to allow two-way communications between all personnel. Viking Industrial acknowledges that effective consultation and extensive participation by personnel is essential for the desired environmental awareness culture to exist. Various means exist to secure the involvement and commitment of personnel. These include:

- Audits
- Corrective action development & implementation
- Environmental objectives
- Incident investigation and reporting
- Inductions
- Job safety analysis (includes environmental hazard and risk analysis)
- Procedure development and review
- Environmental alerts
- Environmental Clearance Certificates
- Environmental inspections
- Toolbox meetings
- Training
- Daily pre-start meetings
- Email

- Notice boards
- Employee shift reports

3 Business Conduct and Indigenous Affairs

3.1 Intent

All activities and operations are conducted in an ethical manner that supports fundamental human rights, respects the traditional rights of indigenous peoples and values their cultural heritage.

All work under the responsibility of Viking Industrial is assessed prior to mobilisation to ensure that the work does not impact on local indigenous populations. If it is found that the work does impact on local indigenous populations then the treatment of any issues arising from this impact will be addressed through consultation with all key stakeholders in the project. The consultation process is guided by the principles outlined in the Viking Industrial Indigenous Policy.

The potential to impact local indigenous populations will form part of every premobilisation / Client risk assessment.

4 Operations and Maintenance

4.1 Intent

All work activities that have the potential to adversely affect operations including the safety and health of people, the environment, or cause damage to equipment, are carried out in a safe manner by ensuring all plant and equipment is operated, maintained, inspected and tested using systems and procedures that manage all risks.

Viking Industrial have conducted risk assessments on all Power Generator equipment and further ensure that the risks associated with this operation and maintenance is identified and actions put in place to mitigate these risks through our Ready for Rent Inspections carried out prior to each individual item of mobile plant being allowed to go to work. The ongoing management of the risks associated with our power equipment is further reduced by ensuring the equipment is maintained to the OEM standards through our ongoing maintenance program, this program is documented on relevant forms to ensure that this maintenance is recorded and stored on the equipment to allow the business to capture both costs and history of each individual piece of plant. All documentation relating to mobile and fixed plant is maintained by the Viking Industrial maintenance department.

5 Contractors, Suppliers and Partners

5.1 Intent

To ensure that the sub-contracting of services, and the purchase, lease of equipment and materials does not present risk to safety and health of people or to the environment, and where possible, to enhance community development opportunities.

Viking Industrial have in place a sub-contractor management procedure that dictates the process to be followed when engaging contractors to assist us manage our operational commitments. In line with Viking Industrial corporate values, we make extra effort where practical to utilise contractors local to the project site. This commitment ensures that the communities in which we operate have every opportunity to benefit financially and to increase the opportunity of employment for local persons.

All contractors coming to the project utilise Viking Industrial Environmental Management Plan (this document) and are asked to supply a Work Method Statement for approval (if conducting high risk work) or relevant working instructions.

6 Product Stewardship

6.1 Intent

The responsible production, transport, storage, use, recycling and disposal of Viking Industrial products and by-products are promoted to minimise their life cycle impacts.

Viking Industrial does not have product stewardship over any of the raw products removed from any of its projects. We work with our clients in a consultative manner to ensure that the responsible parties take accountability for the correct and proper transport, storage, use, recycling and disposal of all site related products. Our commitment is to assist the client follow all processes they have in place to ensure that best practice in recycling of waste materials are carried out.

7 Incident Management

7.1 Intent

Incidents are identified, reported and investigated, and that appropriate corrective and preventive action is taken.

Viking Industrial take any incident and / or accident seriously, and as such have in place Unplanned Occurrence Procedure. Viking Industrial Management Procedure to be followed in the situation of an incident across any of our site. This procedure is put in place to support the sites to investigate any unwanted incidents and assign actions to ensure as far as practicable that the specific event and conditions leading to the event do not occur onsite again.

The incident investigation is carried out with relevant personnel dependent on the potential of the event and the actual outcome for the business.

Any non-conformances to Viking Industrial Preliminary Environmental Management System Documentation shall be captured as an incident and recorded appropriately.

8 Emergency Preparedness

8.1 Intent

Plans and resources are in place to effectively respond to emergency situations

Viking Industrial have an Emergency Management Plan (EMP) in place at all operations that they have responsibility for the management of the Prevention, Preparation, Response and Recovery of the Operation. This plan is the same across all our managed projects and allows the business to put in place effective and consistent processes and practices to mitigate the consequences of any unwanted events.

Once mobilised to site, Viking Industrial will develop an emergency evacuation site drawing and display this in the site office. In the event of an emergency, this will specify who the emergency warden is, their contact details, the evacuation route and assembly location in the instance an emergency occurs.

8.2 First Aid

The identity and phone number of First Aid trained personnel will be made available to all project staff and displayed in the project site office.

Viking Industrial will maintain a suitable First Aid Kit in the Client site office. A suitably equipped first aid kit is also provided in all company vehicles. Snake bite kits will also be available on site within the site office.

8.3 Fire Fighting

Charged and tagged Fire Extinguishers will be located in/on appropriate Client areas in accordance with Viking Industrial documented requirements. In addition, the Viking Industrial HV Inspection requirements will be used as the minimum requirement Fire Suppression is fitted in all power generating plant.

9 Continuous Improvement

9.1 Intent

Monitoring of management systems, operational aspects, environmental performance and compliance, throughout Viking Industrial, by review, audits and inspections will be undertaken to drive continuous improvement.

Viking Industrial have developed and implemented a business wide internal audit schedule. The aim of this schedule is to ensure that we are in compliance with our internal systems and processes. This schedule has been developed taking into consideration the various risk rankings documented in our risk assessments and are targeted at our high to extreme risk activities.

We encourage participation by our client representatives during any of our audits conducted across their operation and commit to sharing the findings of audits with our clients.

Each audit report will have corrective actions entered in an action register system so as to allow the business to track each action to closure and to follow up these actions to ensure that each action is in fact physically closed out.

Inspections shall be carried out across each of our operations on a regular basis. All corrective actions will be entered in to our action register so as to allow the business to track each action to closure.

| Audit / Inspection Type | Responsible Person | Frequency |
|-------------------------|--------------------------------------|-------------|
| Take 5s | Client commissary team | 10 per week |
| Workplace Inspections | Client Manager | Weekly |
| Management Self Audits | HSE Manager or Representative | 3 monthly |
| Operational Audits | Operations Manager or Representative | 6 monthly |

10 Plan Review

This is a Preliminary Environmental Management Plan and will be subject to annual review. It changes to site legislation and/or processes dictate otherwise and is still under consideration.

Reviews will cover:

- Changes to legislation and standards
- Client Improvement requests

11 **Corrective and Preventive Action**

Managers must ensure that preventive and corrective actions are identified and managed.

The need for such action may stem from a range of sources including (but not limited to):

- Site inspections
- Audit report/Client feedback
- Incident investigations/ reports
- Toolbox talk feedback
- Safety Checklists / Take 5s

Corrective/preventive actions shall be completed within designated timeframes.

Attachment A: Environment and Heritage Risk Assessment – Further Guidance (Sample)

The following table is a sample of guidance for assessing the risks associated with the clients project.

| Category | Sub-category | Guidance | Example |
|-------------|-------------------|----------|---------|
| Environment | Impact Assessment | | |
| | Contamination | | |
| Heritage | Historic | | |
| | Indigenous | | |

| | | | |
|--|---------|--|--|
| | | | |
| | Natural | | |

Preliminary