

Shelf Subsea Pty Ltd believes that the irresponsible use of alcohol or prohibited drugs has the potential to impact on the worksite and:-

- Cause death or injury to personnel
- Cause damage or loss of assets
- Compromise the effectiveness of the safe working culture and safety management

For these reasons, all employees and others associated with worksite activities (e.g. sub-contractors and visitors) are prohibited from being in possession of, or under the influence of, alcohol or drugs at the worksites.

For the purpose of this policy, prohibited drugs include all illegal drugs such as, but not limited to, amphetamines, cannabinoids, ecstasy, hallucinogens, cocaine, opiates, benzodiazepines, steroids, synthetic drugs, and all legal prescription drugs used in a non-prescription fashion.

The Company has a zero tolerance policy for personnel found in possession of, or under the influence of or, who return a confirmed positive test result for alcohol or drugs at any worksite. These employees will be immediately stood down pending an investigation and may be terminated. This policy serves as the first and final warning on this subject.

All Management and supervision shall ensure that this policy, together with any procedures implemented in support of this policy, from time to time, are properly explained and adhered to by employees, visitors, sub-contractors, and subordinates.

Management reserves the right to search personnel baggage at the worksite at any time in the search for drugs and alcohol, or, conduct drug and alcohol testing of any means it deems appropriate on any potential employee for pre-employment checks or any employee involved in an offshore accident or incident, and conduct random testing of employees as required by Company, Client or Regulatory requirements in the various areas of the Company's operations.

It is a requirement for all employees to present for work in a fit state, ready, willing and able to perform their duties as directed. Anyone who has a substance that could potentially impair their ability in their system could endanger the worksite and those associated with the worksite. It should be noted that this includes legal, required, prescription or over the counter medication. Employees who are taking either of these substances must self-report to their manager or supervisor so that a risk analysis can take place.

Any employee who feels that they may have a problem related to drugs and / or alcohol, are encouraged to seek assistance from the Company's Employee Assistance Program (1300 361 008) or one of many counselling groups available.



PETER EVANS
Managing Director

The Directors and Management of Shelf Subsea Pty Ltd recognise that its services could have an impact on the environment through its work related to onshore and offshore operations, and is committed to minimising that impact by pursuing the best environmental practice whenever and wherever practical.

The Company will therefore:

- Set objectives and, wherever possible, quantitative targets to demonstrate continual improvement in environmental performance and prevention of pollution
- Communicate these objectives, through either this policy or a separate document, to both employees and interested parties
- Review the objectives and the Environmental Policy on an annual basis
- Provide training or circulate information to our employees in order that they understand the Policy and objectives and can work efficiently, with minimum harm to the environment
- Ensure all sub-contractors operate in line with the principles of our Environmental Policy
- Meet all legislative requirements and, wherever possible, go beyond these requirements
- Co-operate and communicate openly with our Clients and all other interested parties towards the shared goal of improving the environment

In line with these principles, the Company has established the following objectives:

- To reduce wasting energy at source
- To review existing services to minimise the potential for environmental impact
- To segregate waste during manufacture and maintenance processes more effectively and use safe storage and disposal techniques
- To reduce atmospheric pollution by incomplete combustion from badly maintained equipment through the implementation of a planned maintenance system
- To review the selection of lubricants and chemicals used in offshore services to minimise the impact on marine flora and fauna



PETER EVANS

Managing Director

Shelf Subsea Pty Ltd is committed to ensuring systems and procedures are in place to promote and maintain all employees, contractors and visitors ability to perform tasks safely and efficiently.

An individual's role and their ability to work safely can be directly affected by a number of factors, including the amount of rest periods between work shifts, the duration of work shifts, overall physical, mental and emotional fitness of the individual and the use of alcohol or prescribed and non-prescribed medication or drugs.

Fit for work means that an individual is in a state, physically, mentally and emotionally, that allows them to perform their work competently and in a manner that doesn't affect their or others health and safety.

The objectives of this Policy Statement are to provide and promote a safe working environment at Shelf Subsea by;

- Ensuring employees are fit for work;
- Improving and maintaining Shelf Subsea's ability to meet its duty of care obligations;
- Improving and maintaining an awareness of Fitness for Work responsibilities amongst employees;
- Providing appropriate assistance to overcome problems that could impair fitness for work;
- Providing effective, fair and constructive procedures for dealing with people who are unfit for work; and
- Monitoring compliance and enforcement of this Policy and its procedures, including drug and alcohol testing

Management (including Supervisors) are responsible for ensuring, within their level of control, the health and safety of employees, and the provision of training, competencies and resources to ensure people adhere to the 'Fitness for Work Policy' and its procedures.

All employees are required to take reasonable care for their own health and safety, and that of any other person that may be affected by their work activities. Employees are also required to comply with all reasonable instructions and directions established to provide a safe and healthy working environment.

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PETER EVANS
Managing Director

Shelf Subsea Pty Ltd is committed to assisting injured workers to return to work as soon as medically appropriate and will adhere to the requirements of the *Workers' Compensation and Injury Management Act 1981* in the event of a work related injury or illness.

Management supports the injury management process and recognises that success relies on the active participation and cooperation of the injured worker. Whenever possible, suitable duties will be arranged internally having regard for the injured worker's medical restrictions.

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PETER EVANS
Managing Director

It is Shelf Subsea Pty Ltd's policy to ensure that personnel are protected from hazards in the workplace, as far as reasonably practicable. This will be achieved through hazard identification, risk assessment and application of the hierarchy of controls. Once all other practicable controls have been implemented, Personal Protective Equipment (PPE) shall be worn as the final line of control.

All Shelf Subsea personnel, contractors and visitors shall wear PPE in accordance with the Shelf Subsea's Personal Protective Equipment Procedure IMS-S-PR-016. The procedure describes the types of PPE and the circumstances in which the PPE must be worn. The procedure is to be adhered to in all Shelf Subsea's operations, including workshop, offshore and in-water operations.

At client or third party work-sites, Shelf Subsea personnel and sub-contractors shall wear PPE as required by site procedures or Shelf Subsea's procedures, whichever is the more stringent.



PETER EVANS
Managing Director

The Quality Mission of Shelf Subsea Pty Ltd is to diligently pursue operational and financial objectives while maintaining the highest regard for the management of Quality performance. Shelf Subsea will be the marine construction services provider of choice through continued customer satisfaction with “Incident and Injury Free” work environments.

As such, we will provide our customers with products and services that meet or exceed industry standards, customer specifications and regulatory requirements. Through our Quality Management System we will provide these products and services on time and within specifications, the first time and every time.

Shelf Subsea’s Management Team fully supports the establishment and implementation of the Quality Management System. The Management Team shall promote a quality work environment that encourages continual improvement in all operational and HSE processes, and a commitment from all employees to provide the highest quality of work in all day-to-day activities.

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PETER EVANS

Managing Director

Shelf Subsea Pty Ltd recognises the importance of employee safety and is committed to preventing injury and illness through providing a safe and healthy work environment. Notwithstanding this, we also recognise that workplace incidents may happen from time to time and in the event that employees do sustain an occupational injury, Shelf Subsea is equally committed to the process of workplace injury management and occupational rehabilitation.

This will be achieved through:

- Nomination of a Return to Work Coordinator
- Nomination of approved rehabilitation providers
- Ensuring that effective procedures are in place to support occupational rehabilitation
- Ensuring that rehabilitation services and return to work activities commence immediately, or as soon as is necessary to ensure the earliest possible return to pre-injury employment
- Ensuring that suitable duties, including modified or alternate duties, are made available where practicable to assist the injured employee to remain at work or to return to work at the earliest opportunity
- Maintaining a register of incidents
- Maintaining the confidentiality of information relating to employees participating in occupational rehabilitation in accordance with privacy legislation
- Ensuring that a rehabilitation program is voluntary and does not prejudice an injured worker

RESPONSIBILITIES

The Return to Work Coordinator is responsible for:

- Assisting injured employees where practicable to remain at or return to work
- Commencing rehabilitation as early as possible in accordance with medical advice
- Liaising with injured employees, their supervisors and their treating medical and health professionals
- Monitoring the progress of injured employees
- Preparing a return to work plan where appropriate in consulting with all parties concerned

Heads of Department are responsible for:

- Where practicable providing or identifying suitable duties for injured employees
- Ensuring the work environment is suitable or that appropriate modifications are made or equipment is provided to enable a safe return to work
- Supporting the employee and the return to work program
- Liaising with the HSE department on matters relating to the employee's return to work program

Employees are responsible for:

- Promptly reporting all injuries or illness to their supervisor
- Cooperating with CDIA to enable it to meet its rehabilitation obligations
- Promptly submitting all relevant medical certificates and reports, together with leave applications for absences
- Attending medical examinations relating to the actual injury or illness as arranged by Shelf Subsea or its insurers
- Cooperating in reasonable workplace changes designed to assist the rehabilitation to another employee

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PETER EVANS

Managing Director

Shelf Subsea Pty Ltd philosophy is that, in the performance of our work, the Health, Safety and Welfare of our people, the protection of assets and the environment are of primary concern.

Therefore, should any occasion arise where it is felt that to commence or continue with a work activity, the following applies:

All personnel are expected and obligated to cease operations whenever they feel that conditions are unsafe or there is an unacceptable risk to personnel, equipment or the environment.

If there is any doubt about ceasing the activity, you should consult with your immediate supervisor.

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PETER EVANS
Managing Director

Shelf Subsea Pty Ltd values the safety and health of all people involved with its activities. The Company operates in the marine construction industry, providing diving and construction services, and is committed to achieving the highest standard of safety and health performance through the establishment and periodical review of objectives, monitoring and measurement, and a commitment to continual improvement and the prevention of injury and ill-health. Hazard identification, risk assessment and risk control are considered to be the cornerstone of the Work, Health and Safety Management System (WHSMS).

The Directors maintain that no operation is so important that it has a higher priority than the safety and health of employees.

Management will work together with supervisors and employees to ensure compliance with all relevant Work, Health and Safety Legislation and best safe practices in the marine and diving industries.

Safety and Health at work is both an individual and shared responsibility of all employees. All levels of management and employees shall undertake their responsibilities to ensure the successful implementation of this Work, Health and Safety Policy:

Senior Management and Managers' Responsibilities

- To provide and maintain a Safe and Healthy working environment in which employees' exposure to risk and hazards are minimized to a level 'As Low As Reasonably Practicable'
- To provide ways for employees to be informed and involved in workplace safety and health.
- To ensure compliance with Work, Health and Safety Legislation
- To make available the necessary resources to meet the objectives of the WHSMS

Line Management, Superintendents and Supervisors' Responsibilities

- Supervise employees to ensure safety and health procedures and instructions are followed
- To ensure employees receive; a HSE induction prior to project start-up, emergency and rescue training prior to commencement of offshore tasks, training briefs prior to operation of systems or equipment
- To ensure employees receive safety precautions by toolbox talks and close supervision at work
- To provide the initiative and follow-up actions to maintain this policy within their own sections
- To ensure proper safe planning is provided at the work site after risk assessments
- To account for the safety and health of employees and working conditions under their control

Employees' Responsibilities:

- To ensure his/her own safety, as well as the safety of his/her co-workers
- To follow safety and health instructions and the use of personal protective equipment provided by the employer for his/her own safety and health
- To report workplace incidents (including near misses) and hazards to his/her supervisor promptly
- To participate in resolving safety and health issues at his/her workplace

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PETER EVANS
Managing Director