



BRIDGEMAN
experience that delivers

Bridgeman Workplace Relations
Management Plan

(WRMP)

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WRMP PURPOSE & OBJECTIVES

The document outlines our Employee Relations practices and specific responsibilities to ensure the successful implementation and execution of the plan. This Workplace Relations Management Plan (WRMP) is an integral part of the Bridgeman Agencies employment and management systems.

Bridgeman recognises that proper and effective management of employee and industrial relations is crucial to the successful completion of all projects. In particular, we understand the important role of the Code for Tendering and Performance of Building Work (The Building Code 2016) and the relevant Government and State Industrial Relations Guidelines.

Bridgeman will, in the conduct of employee and industrial relations, use the best practices available and will exercise the highest standard of skill, care and diligence in the performance of its obligations, while ensuring subcontractors include like provisions and follow equivalent practices with the objective of ensuring at all times, a successful project delivered in accordance with all relevant Codes.

The Bridgeman WRMP plan has been prepared in the knowledge of the current industrial relations environment.

REVIEW

As project specific details can change and the industrial relations landscape is dynamic, Bridgeman will review this document to ensure it remains relevant for all employee relations issues that might impact upon a particular project.

The Bridgeman Human Resource Advisor is responsible for review and audit of this plan.

For project specific plans, it will be reviewed within three months of project commencement and then on an as-required basis periodically throughout the delivery of the Project

BRIDGEMAN WORKPLACE RELATIONS POLICY

Below is the Bridgeman Agencies Workplace Relations Policy

Bridgeman Workplace Relations Policy

Bridgeman strives to be an employer of choice in the manufacturing, building and construction industries.

Building on our corporate values we seek to create a work environment based on mutual trust, benefits, harmony and respect for all stakeholders.

At Bridgeman, we aim to develop teams of motivated and competent members who can utilise their skills in creating and ensuring long term sustainable employment opportunities. We aim to achieve this by continuous improvement of our workplace relations practices to ensure the best outcomes for our business, our customers and our team.

Bridgeman ensures that all parties are recognised in its employment and workplace relations framework through open and engaging communications and negotiation practices. Bridgeman recognises and acknowledges the role played by employee representatives in communicating and supporting employee interests and supports the right of individuals and teams to seek assistance, advice or representation.

The Bridgeman Director and Executive Leadership Team are committed to the following key workplace relations principles:

- Bridgeman industrial relations and employment policies and procedures, including employment contracts and workplace agreements, comply with current state and federal laws and industry standards.
- At Bridgeman we ensure equal employment opportunities through merit based appointment and promotion.
- We actively promote cultural diversity through the development of inclusive employment practices.
- Bridgeman builds employment relationships based on mutual respect and trust by acknowledging the rights of all stakeholders.
- We foster leadership that strives to develop and maintain positive, productive and respectful relationships with team members.
- We ensure the provision of training which enhances the ongoing development of team members.
- We engage team members in Bridgeman's WH&S, QA and Environmental systems.
- We encourage and promote work life balance by creating rewarding jobs with pay and conditions consistent with our industry.
- Bridgeman maintains systems for reporting, recording and responding to team member's grievances.



Adam Sarota - Director

PART A – ADMINISTRATION

A1. – Project Organisational Structure

The Project organisational structure refers to the positions applicable for the operation of a project – **SEE APPENDIX A**

A2. – Accountabilities and Responsibilities of Key Personnel

The accountabilities and responsibilities of key personnel with respect to Workplace Relations Management on Bridgeman projects are described below:

PROJECT MANAGER

- Overall day to day management of the project, site and all site personnel;
- Implementation and application of this WRMP to monitor compliance with the Building Code 2016 and the relevant state Guidelines;
- Managing labour productivity to ensure the project timelines are met without disturbance including regular reporting to the client;
- Determining employment/labour requirements;
- Management of subcontractors on site to ensure compliance with the Building Code 2016 and relevant State IR Guidelines is achieved through awareness training, tool box talks and notifying of obligations through contractual documentation;
- Managing any employee or contractor grievance in accordance with the Bridgeman Grievance Management as outline in this WRMP;
- In consultation with the HSE Advisor, ensure employees and subcontractor induction records are completed and recorded;
- Management of Right of Entry (RoE) obligations in accordance with Part J of this WRMP, the Fair Work Act, Building Code 2016, the relevant state IR Guidelines and where required, the Work Health and Safety Act 2011;
- Notifying HR and client of a breach or suspected breach of the relevant state Guidelines, which will then be reported to the relevant bodies by the Human Resources Advisor within 24 hours of the Company becoming aware of a breach or suspected breach;
- Notifying HR and client of a breach or suspected breach of the Building Code 2016, which will then be reported to the relevant bodies as soon as practicable by the Human Resources Advisor and
- Ensuring all site personnel have completed the site specific induction as defined in **Part C** of this WRMP.

SITE SUPERVISOR

- Managing the daily labour productivity of the workforce as well as subcontractors to ensure project time frames are met in accordance with the client contract documents;
- Conducting site practices and protocols fairly and consistently in accordance with the requirements of the Bridgeman WRMP plan and referenced industrial instruments;
- Reporting to the Project Manager all Workplace Relations issues or concerns;
- Monitoring the practices of subcontractors to ensure compliance with Bridgeman Workplace Relations obligations, the Building Code 2016 obligations and relevant IR Guidelines such as Right of Entry requirements, Freedom of Association provisions and

adherence to the **Bridgeman Fitness for Work Policy**;

- Ensuring there is a continuous open communication channel on site with direct employees, subcontractor employees, visitors and building association officers, delegates and other representatives;
- Assist the Project Manager with Right of Entry obligations in accordance with the Fair Work Act, Building Code 2016, relevant state IR Guidelines and where required the Work Health and Safety Act 2011;
- Notify the Project Manager or Human Resource Advisor of a breach or suspected breach of the relevant state IR Guidelines, which will then be reported by HR as required;
- Notify the Project Manager or Human Resource Advisor of a breach or suspected breach of the Building Code 2016, which will then be reported as required;
- Highlight and assist in rectifying any inconsistent or deficient Workplace Relations practices to the Project Manager

HEALTH SAFETY & ENVIRONMENTAL ADVISOR (HSE ADVISOR)

- Consulting with and advising the Project management team of safety issues for direct labour and subcontractors;
- Assisting the Project Manager in the management of Right of Entry visits to ensure they are consistent with the Fair Work Act, Building Code 2016, the relevant state IR Guidelines and Work Health and Safety Act 2011;
- Ensuring there is a continuous open communication channel on site with direct employees, subcontractor employees, visitors and building association officers, delegates and other representatives;
- Ensure that all personnel on site, whether they are Bridgeman employees, subcontractors or visitors, understand and adhere to the Bridgeman Fitness for Work policy and the Drug & Alcohol Policy and Testing Procedure;
- In consultation with the Project Manager, ensure subcontractor induction records are held accessible to all relevant management and clients
- Ensuring the implementation of quality assured management systems by experienced personnel; and
- Delivering and reporting on the successful completion of the Site Induction by all site personnel as per **Part C** of this WRMP.

HUMAN RESOURCE ADVISOR

- Providing support to the Project Manager and all project staff in relation to the WRMP, the Building Code 2016 and relevant state IR Guidelines compliance, and any Workplace Relations issues;
- Offering advice to subcontractors (where required), in relation to the WRMP, the Building Code 2016 and relevant state IR Guidelines compliance, and any Workplace Relations issues;
- In consultation with the Project Manager, reviewing the Risk Assessment for the Project;
- Management and reporting of a breach or alleged breach of the state IR Guidelines to the relevant bodies within 24 hours after the Company becomes aware of a breach or alleged breach. This may include a breach in right of entry provisions, freedom of association and/or suspected or actual industrial action;
- Management and reporting of a breach or suspected breach of the Building Code 2016 to

the relevant bodies as soon as practicable, but not more than 2 working days after the company becoming aware of a breach or suspected breach. This may include a breach in right of entry provisions, freedom of association and/or suspected or actual industrial action. Any notification of a breach or suspected breach will be in accordance with section 17 of the Building Code 2016;

- In conjunction with the Project Manager, reviewing the WRMP and IR practices as required to ensure relevance and compliance with legislation;
- Management of employment contract documents, industrial instruments and internal audits of Bridgeman's compliance with the WRMP; and
- Ensuring letters of offer and other common law documents reflect WRMP requirements including freedom of association, grievance management and unlawful industrial action.

Where required the Human Resources team will provide; advice on employee and Industrial relations matters, coordinate all direct recruitment and assist with training and site mobilisation.

QUALITY AND INDUSTRIAL RELATIONS ADVISOR

- Providing strategic advice and guidance to the Project Manager on employee and industrial relations;
- Reviewing the WRMP to ensure the plan is implemented and all requirements actioned;
- Working with the Human Resource Advisor on employee and industrial relations matters;
- Coordinating annual wages reviews to ensure employees are paid correctly;
- Coaching the Project team on RoE obligations as required; and
- In conjunction with Project Manager, managing any industrial dispute or demarcation disputes.

GENERAL MANAGER

- Undertake project reviews to ensure compliance with contractual and procedural requirements on the Project.
- Manage and review the commercial contractual agreements
- Assesses the impact of key business initiatives on stakeholder groups (shareholder, customer, employee) and develops plans to address potential risks/opportunities;
- Creates and oversees sound risk management practices within Bridgeman Agencies;
- Provides risk and commercial related expert advice; and
- Reports to the CEO on any Security of Payments issues or concerns.

A3. – RELATIONSHIP MANAGEMENT

Bridgeman is dedicated to providing a harmonious workplace with open communication channels (refer to **Part D** – Communication). This is fostered by the following key relationship management methods:

- Regular site visits and interactions from both the HR Advisor and management support (refer to Org Chart);
- The onsite induction acts as the first point of communication between most personnel, including employee, subcontractor employees, management and visitors and Bridgeman, and is where critical information regarding the Project is communicated. The HSE Advisor

- is responsible for the delivery of the onsite induction and records maintenance;
- The Site Supervisor will conduct daily pre starts, tool box talks and site meetings along with the HSE Advisor to communicate key project information and allocate/co-ordinate work tasks to employees and subcontractors for the day to day activities; and
- Notices placed on staff noticeboards, key milestones and critical project information communicated to all site participants.

Officers, delegates and other representatives of building associations' access to site is managed in accordance with the Right of Entry provisions in the Fair Work Act 2009 and where applicable, the Work Health and Safety Act 2011. These relationships are managed by the Project Manager and/or Site Supervisor, in consultation with the Bridgeman Human Resources Advisor. Please refer to the process for communication in Part D of this WRMP.

PART B – WORKPLACE RELATIONS RISK & PAST EXPERIENCES

B1. – PAST EXPERIENCES

Bridgeman prides itself on its Industrial Relations track record and delivering manufacturing and construction projects on time and within budget by implementing quality assured management systems.

Evidence of Bridgeman’s history can be provided if and as required.

B2. – RISK ASSESSMENT

Bridgeman implements a robust process in relation to industrial relations by educating management on the importance of following the Bridgeman policies and procedures in regards to Right of Entry, Mobilisation to Project and Subcontractor Management.

Industrial relations risks have been identified in the below table (see Risk Matrix below) compiled by the HR Advisor.

| POSSIBLE RISK | LIKELIHOOD | CONSEQUENCE | MITIGATION |
|-------------------------------------|------------|-------------|--|
| Unlawful Industrial Action Low High | Low | High | <ul style="list-style-type: none"> • Diligent application of the WRMP in accordance with the Building Code 2016 and the relevant state IR Guidelines. • Pre-qualification of subcontractors; including but not limited to subcontractors completing an industrial relations checklist, checking industrial impacts, Building Code 2016 and relevant state IR Guidelines compliance. • Maintain capabilities and preparedness to respond to threatened or actual unlawful action in accordance with the Building Code 2016, IR Guidelines, Work Health and Safety Act 2011 and the Fair Work Act 2009. |

| POSSIBLE RISK | LIKELIHOOD | CONSEQUENCE | MITIGATION |
|-----------------------------|------------|-------------|--|
| Lawful Industrial Action | Low | High | <ul style="list-style-type: none"> • Direct Labour – all direct labour will be engaged under Bridgeman employment Agreements • Subcontractors – all subcontractors will be required to demonstrate that this risk is negligible with respect to their employees |
| False Safety Disputes | Low | High | <ul style="list-style-type: none"> • Bridgeman projects will maintain the highest standards of WHS and establish an empowered and educated HSR network. Any attempt to misuse safety for industrial purposes will be met with formal legal responses under the Work Health and Safety Act 2011 and/or the Fair Work Act 2009. |
| Stoppage (State Wide) | Low | High | <ul style="list-style-type: none"> • Rare state-wide union protest in the form of industrial action (however not envisaged) may rarely occur. • Should such an event be planned or organised, the Project (in consultation with the client) will seek undertakings from the relevant unions that the Project will not be affected. If these are not forthcoming the threatened action will be treated as Unlawful Industrial Action. |
| Code Compliance | Low | High | <ul style="list-style-type: none"> • Compliance with the WRMP will be a contractual requirement for all subcontractors. • Subcontractors will be asked to self-audit, maintain all records and provide Bridgeman with their relevant findings to ensure compliance |
| Right of Entry (RoE) Events | Medium | Medium | <ul style="list-style-type: none"> • Bridgeman will ensure all RoE visits are managed in accordance with the required RoE plan • Where RoE is abused, Bridgeman will contact the relevant bodies in accordance with the Building Code 2016 and in accordance with the relevant state IR Guidelines |
| Demarcation Dispute | Low | Medium | <ul style="list-style-type: none"> • As a straightforward civil construction project there should be no demarcation issues. If any union seeks to disrupt the Project with the objective of obtaining membership or displacing other unions, the Project will respond in accordance with the relevant legislation and Codes and keep the clients informed. |

PART C – INDUCTION

Bridgeman employees are required to provide all relevant documentation (including but not limited to Certificates of Competency, trade or other professional qualifications, their birth certificate, visa or other evidence confirming their right to work in Australia) to the Human Resource Advisor during the recruitment and on-boarding process.

All employees will have also have undertaken training through relevant Bridgeman induction processes including Health, Safety & Environmental procedures and are provided with copies of all Bridgeman's company policies.

When Bridgeman engages subcontractors, they are required to complete an induction prior to engagement. As part of their onboarding, subcontractors must provide their relevant documentation, personal details, qualifications, working rights and confirmation of all insurances required.

Inductions are carried out by Bridgeman HR Advisors or approved representatives and will not be held by officers, delegates or other representatives of building associations.

The Bridgeman Project Management team will not allow secondary inductions by officers, delegates or other representatives and will strongly enforce the WRMP, the Building Code 2016 and the relevant state IR Guidelines.

Bridgeman site specific inductions are completed by all employees and subcontractor's employees prior to commencement on any project site. In order to facilitate improved labour productivity, subcontractors are able to complete a Bridgeman induction which is tailored for subcontractors only.

The site induction is be undertaken by the HSE Advisor or an approved Bridgeman representative, however it is the ultimate responsibility of the Project Manager to ensure that all site personnel have completed the appropriate project induction.

Visitors are given a visitor induction and then must be escorted at all times whilst onsite.

The Site Induction will cover a wide variety of topics including:

- Bridgeman policies (Fitness for Work, Drug & Alcohol Policies, Employee and Industrial Relations etc);
- Site Specific Requirements;
- Brief Project scope of works;
- Building Code 2016;
- Relevant state IR Guidelines;
- Safety Procedures
- Code of Conduct;
- Security protocols; and
- Freedom of Association;
- Coercion;
- Right of Entry;

The HR Advisor's contact details will be provided during the on-site induction and published onsite should any employee or subcontractor employee wish to raise any concerns that they may be subject to discrimination or coercive activity.

Where there is an actual or suspected breach the Human Resource Advisor will notify the relevant bodies in accordance with this WRMP.

PART D – COMMUNICATION

Bridgeman is committed to ensuring there is a continuous open communication channel at all times including on site with direct employees, subcontractor employees, visitors and building association officers, delegates and other representatives.

To ensure all parties on site are aware of the requirements of the Code and the importance of complying with the Code, we will:

- Conduct regular training for our employees on the Code, including within three months of construction commencement.
- Discuss Code compliance at regular project coordination (or howsoever described) meetings.
- Before entering into a subcontract with a subcontractor, we will require confirmation from the subcontractor regarding their awareness of the Code and its requirements.
- During inductions we will communicate the requirements of the Code and the importance of complying with it to all inductees.
- We will regularly discuss the Code at on-site meetings, including subcontractor and toolbox meetings.

Methods of communication include:

- Face-to-face communication where the HSE Advisor an approved Bridgeman representative, will communicate key information during and following induction;
- Pre-start talks will take place at the beginning of each shift for all personnel engaged on the Project to provide an update on the daily schedule, allocation of tasks, safety information and relevant industry updates; and
- Site meetings or tool box talks will be conducted by the Project Manager/ Site Supervisor on a regular (daily / weekly) as required basis to highlight messages regarding key aspects of the Project such as the progress of the program, safety, quality and environmental updates, as well as relevant information regarding the Building Code 2016 and relevant state IR Guidelines (including coercion and freedom of association).

The Human Resource Advisor will be responsible for communicating and providing material on the Building Code 2016 and the relevant state IR Guidelines.

They will ensure all relevant subcontractors' industrial instruments have been assessed by the relevant authority to ensure Building Code 2016 compliance (e.g. ABCC letter of compliance for relevant Enterprise Agreement or Declaration of Compliance for operation under the Modern Award); and

Additionally, the HR Advisor will provide education and training material on the Building Code 2016 and relevant state IR Guidelines compliance for the project team (including freedom of association, discrimination and coercion).

PART E – SUBCONTRACTOR MANAGEMENT

E1. – SUBCONTRACTOR SELECTION

Bridgeman has an established subcontractor evaluation process to ensure subcontractors contribute towards the achievement of all Bridgeman subcontractor requirements and additionally an individual Project's overall objectives.

Subcontractor selection is based on a company's ability to undertake the work and the price that they provide for the scope of works.

Prospective subcontractors must demonstrate to Bridgeman that they have the skills, experience and resources necessary to effectively hire, deploy and mobilise labour that matches the profile of the skills and behavioural characteristics required by their respective scope of works.

Ensuring that subcontractors will not be discriminated against or coerced, unduly influenced or unduly pressured to make above-entitlements payments or to contribute to a particular fund or scheme, or support a particular product, service or arrangement. To ensure that discrimination or coercion do not take place throughout the duration of the subcontractors work on the Project, the following will occur:

- Subcontractors (both management and employees) attend the Bridgeman induction outlined in Part C, which provides them with information regarding their right to freedom of association and their obligations to report activity or behaviour that may contravene the Fair Work Act, the Building Code 2016, the relevant IR Guidelines or the Health and Safety Act 2009;
- The HSE Advisor will be responsible for ensuring the details of the relevant Human Resource Advisor are made available to all personnel on site during the induction process for the purposes of reporting underpayments, above-entitlement payments, discriminative or coercive activity;
- The Project Manager and Site Supervisor will be responsible for monitoring the behaviour of personnel on site and will report any claims or suspicions of discrimination or coercion to the Human Resource Advisor as soon as possible where this will be investigated and acted upon in accordance with the Building Code 2016.

E2. – SUBCONTRACTOR COMPLIANCE

Subcontractors will be contractually required to comply with the Building Code 2016 and the relevant state IR Guidelines in order to qualify for their proposed scope of works.

To ensure a coordinated Workplace Relations approach is adopted, subcontractors engaged by Bridgeman will be required to submit the following as part of the pre-qualification process for their proposed scope of works to assess their industrial relations risk and ability to comply with the Building Code 2016 and the relevant state IR Guidelines.

This assessment will be sent to all subcontractors and the review will be managed by the Human Resource Advisor before approval is granted:

- A completed and signed Subcontract Industrial Relations Checklist declaring compliance with both the Building Code 2016 and the relevant state IR Guidelines (this is an assessment of industrial instruments, conditions of employment, policies and procedures);
- Provide an ABCC compliance letter for their relevant Enterprise Agreement or a Self-Declaration form for their relevant modern award, or other workplace arrangement, or an enterprise agreement made before 25 April 2014 that has not since been varied in accordance with section 207 of the Fair Work Act 2009.

Bridgeman will only approve subcontractors who meet the requirements of section 23 of the Building Code 2016 and will not move forward with a subcontract until compliance is achieved.

The subcontractor must:

- Provide evidence of self-audits regularly to Bridgeman to ensure compliance with the Building Code 2016 and the relevant state IR Guidelines;
- Submit a completed monthly statutory declaration stating they have and will continue to comply with all applicable Commonwealth industrial agreements, including but not limited to the payment of correct wages and entitlements;
- Provide Bridgeman with written evidence of any occurrence where the subcontractor has reported underpayment of wages and entitlements to the ABCC for investigation;
- Immediately advise Bridgeman of any Right of Entry requests sent to the subcontractor;
- Notify Bridgeman immediately of any attempted coercion, industrial action (protected or unprotected, actual or threatened), industrial claim, potential or impending industrial dispute, or actual industrial dispute that may affect the Project;
- Maintain appropriate employment, payroll and taxation records of their employees;
- Ensure all subcontractors and labour hire employees engaged on the Project are compliant with the Building Code 2016 and the relevant state IR Guidelines, and comply with the Bridgeman WRMP nominated for the Project;
- Ensure compliance with all statutory obligations and their Commonwealth industrial agreements; and
- Take all reasonably practicable steps to prevent or bring to an end any unprotected industrial action taken by the employees of the subcontractor.

PART F – CONDITIONS OF EMPLOYMENT

Bridgeman currently employs under relevant Award Agreements and does not have any Enterprise Agreements (EA) in place.

The Bridgeman Human Resource Advisor is responsible for overseeing the recruitment process for Bridgeman candidates and ensures all new employees are provided with a Letter of Offer that is consistent with the conditions of their employment outlined in the relevant Award.

As required Bridgeman will undertake a review of the wage rates and a payroll report consisting of employees' wages and allowances to ensure no overpayments or underpayments are made. Corrective actions will be taken by the Human Resource Advisor if such errors are identified.

A bi-annual review is undertaken of all Bridgeman employees by the Financial Officer to ensure compliance with the above agreements and common law contracts.

PART G – LABOUR PRODUCTIVITY

Labour productivity is a key measure of Bridgeman's business efficiency.

Bridgeman HR department and Project Managers continuously work to optimise productivity on Bridgeman Projects by:

- Recruiting a skilled workforce;
- Training the workforce to ensure operatives are qualified and competent to perform the work;
- Allowing sufficient time in project planning for weather events such as rain and extreme heat (as mentioned above);
- Using reliable and well-known suppliers to ensure materials are delivered on time;
- Embracing new information technology methods and devices in an effort to decrease time spent on administrative tasks

Bridgeman continuously strives to develop and implement improved systems to drive increased levels of efficiency and productivity. Labour productivity and value for money is achieved by:

| OVERVIEW | RESPONSIBILITY | TASK |
|--------------|--|--|
| Costs | Project Manager / Financial Controller | Monitors cost versus productivity of key self-performed activities and compares the results to the forecast budget cost |
| Productivity | Project Manager | Monitors and reviews productivity by comparison of the actual to-budget costs on a monthly basis. Labour productivity is measured throughout the course of a Project and is a key component of monthly reporting to senior management on the Projects program status. |

| OVERVIEW | RESPONSIBILITY | TASK |
|--|------------------------------------|--|
| Targets | Project Manager | Review construction methodologies and work practices to determine if more efficient practices could be implemented especially if targets are not being met |
| Milestones | Project Manager | Reviewing of the Project program is done on a monthly basis to ensure that the current program is not being compromised and to take remedial action if current performance is not achieving the program milestones; |
| Subcontractor Performance | Project Manager | Subcontractor performance is managed by the Project Manager to ensure on-time, on-budget delivery of the subcontract works package; |
| Resource Management (Plant / Labour etc) | Site Supervisor Project Manager | The Site Supervisor manage plant, labour and other resources on a day to day basis in order to ensure that the programmed construction activities and milestones are met. The Project Manager will provide cost information to the Superintendent as a productivity measure of labour, plant and subcontractor efficiency |
| Incliment Weather | Project Manager Site Supervisor | The Project Manager will communicate when inclement weather will affect the daily program. The site supervisor will then take steps to protect or isolate the employees from the inclement weather conditions and deploy the employees to other work (including alternative work sites), where the Employee can work safely in reasonable conditions where feasible; or stop work (and remain on site), until work can be undertaken safely and in safe conditions. |
| RDO's | Project Manager | Employee RDO's will be taken into account when the program is constructed. Subcontractor RDO calendars, if applicable, will be managed between the relevant subcontractor manager and the Bridgeman Project Manager in accordance with applicable industrial instrument obligations. |

Bridgeman also provides quality assured management systems, with ISO accreditation in the areas of quality, safety and environment.

PART H – ENGAGEMENT OF DIRECT LABOUR

Bridgeman has well established recruitment and on-boarding practices utilising effective recruitment strategies to identify suitable candidates.

Bridgeman offers a balance of experienced management, inhouse training and flexible work practices with attractive career opportunities which supports our high employee retention rate.

The Bridgeman *'Project Specific'* recruitment process consists of the following steps:

- The Project Manager determines the labour requirements for the Project, and completes an analysis of the skills and qualifications required;
 - HR is advised of the staffing and qualification requirements and carry out an internal assessment on current staff.
- Additionally, prospective employees from the surrounding area are then targeted using appropriate advertising media;
- Bridgeman will ensure that its recruitment process provides adequate opportunity for Australian residents and Australian citizens to apply for employment through the placement of local advertisements. Locals are given preference before looking to employ non-citizen or nonresidents.
- Candidates are required to provide copies of their qualifications, licences and proof of their right to work in Australia, to the recruitment team who retain secure copies;
- Thorough reference checks, are undertaken by the recruitment team and will be conducted using a standard behavioural based interview process.

All aspects of the Bridgeman recruitment, selection and on-boarding procedure comply with Freedom of Association obligations with the Building Code 2016 and relevant state IR Guidelines.

PART I – FREEDOM OF ASSOCIATION

The Project Manager will ensure the following obligations are clearly outlined to the Project team and subcontractors. The below standards and practices will apply to any and all employees on site including all subcontractors engaged to perform works on the Project and all contraventions will be reported to the ABCC as required by the Building Code 2016 and other bodies as required by the relevant state IR Guidelines.

Bridgeman will comply with the Freedom of Association guidelines as cited in section 13 of the Building Code 2016 by ensuring:

| OBJECTIVE | BRIDGEMAN ACTION | PROCESS & RESPONSIBILITY |
|-----------------------------|---|---|
| POLICIES | <p>Bridgeman and its subcontractors will ensure that all policies and practices reflect the following requirements:</p> <ul style="list-style-type: none"> • free to become, or not become, members of a building association; • free to be represented, or not represented, by building associations; and • free to participate in, or not participate in, lawful industrial activities; and • not discriminated against in respect of benefits in the workplace because they are, or are not, members of a building association | <p>The HR Department ensures that all policies and procedures do not act against the conditions of Freedom of Association. The HR Advisor will ensure during the subcontractor approval process that subcontractor policies and procedures also do not breach the conditions of Freedom of Association.</p> |
| PERSONAL INFORMATION | <p>Bridgeman will ensure that personal information is dealt with in accordance with the Privacy Act and the Fair Work Act 2009. Names and details of those whom Bridgeman wish to engage or employ will not be provided to third parties, other than in strict compliance with the law (or relevant enterprise agreement).</p> | <p>The Human Resource Advisor will manage all confidential information in accordance with the Privacy Act and the Fair Work act 2009. The HSE Advisor will also follow this process</p> |
| INDUCTIONS | <p>Officials, delegates or other representatives of a building association will not undertake or administer induction processes. Bridgeman will ensure that 'secondary' inductions are not conducted by representatives of building associations.</p> | <p>Induction where the HSE Advisor and Project Management team will ensure this does not occur.</p> |

| OBJECTIVE | BRIDGEMAN ACTION | PROCESS & RESPONSIBILITY |
|-------------------------|---|--|
| UNION MEMBERSHIP | <p>Bridgeman will ensure that ‘no ticket, no start’ signage or similar, is not displayed, that ‘show card’ days do not occur, and that no other conduct occurs which implies that union membership is anything other than a matter for individual choice, including encouraging or discouraging a person from becoming, or remaining, a member of a building association. No person will be required to disclose whether they are a member or a building association.</p> | <p>Bridgeman induction and on-boarding material does not ask for this information. The Human Resource Advisor maintains recruitment records and the HSE Advisor maintains the induction material.</p> <p>The Superintendent and other site staff will monitor any observed activity by building association representatives to attempt to conduct show card days and advise the Project Manager immediately if such activity is suspected. Such activity may be outside the site boundary.</p> <p>The Project Manager, in consultation with the Human Resource Advisor, will take such action as is necessary to stop such activity, including calling the police if necessary. The ABCC will also be notified of any such occurrence. The HR Adviser conducts regular site visits to audit compliance with the relevant legislation to ensure the correct policies and procedures are displayed in the site office, crib room and noticeboards.</p> |
| DISCRIMINATION | <p>Personnel will not be discriminated against or disadvantaged in respect of benefits in the workplace because they are, or are not, members of a building association. Employee representatives will not be discriminated against or disadvantaged.</p> <p>Workplace bullying, harassment or discrimination will not be tolerated. Any complaints arising about such actions must be immediately dealt with by the responsible supervisor. The HR Manager must be informed of such issues and an investigation conducted under the guidance of the HR Manager. If the matters raised are confirmed, immediate action should be taken under the provisions Bridgeman’s Anti-Bully Harassment and Discrimination Policy which provides a consistent and fair approach to dealing with such matters.</p> | <p>Membership information or status is not requested by Bridgeman at any point throughout the engagement of any personnel on the Project.</p> <p>This information is confidential with personnel advised of their Freedom of Association rights and obligations to report non-compliant behaviour to the Project Manager and/or the Human Resource Advisor during the induction process. Employees who identify as employee representatives are not discriminated or disadvantaged on a Project. The Project Management team will ensure actions that are not consistent with the Freedom of Association obligations such as discrimination or attempts to disadvantage those belonging or not belonging to a building association or those who have been elected as an employee representatives, are identified and brought before the Human Resource Advisor who will investigate such action and if required, report to the ABCC in accordance with the Building Code 2016 as a potential breach.</p> |
| SIGNS | <p>Signs that seek to vilify or harass employees who participate, or do not participate, in industrial activities will not be displayed on Bridgeman project.</p> | <p>This will be monitored strictly by the Project Manager and Site Supervisor to ensure that no such signage is displayed and that employees are not vilified.</p> |

| OBJECTIVE | BRIDGEMAN ACTION | PROCESS & RESPONSIBILITY |
|--|---|---|
| FREEDOM OF ASSOCIATION | Employees have freedom of association in deciding whether to be represented in a grievance or dispute procedures and, if so, by whom. | The Bridgeman Dispute Resolution policy provides for freedom of representation which will be managed by the Human Resource Advisor and the Project Manager. |
| FORMS | Any form that requires an employee or subcontractor to identify their union status, is prohibited from use. | Recruitment, on-boarding and induction forms do not request information regarding union status. This is managed closely by the Human Resource Advisor and the HSE Advisor (regarding inductions). |
| REFUSAL TO EMPLOY OR TERMINATE | Employees and subcontractors will not be refused employment or subject to termination based on their union status. | The Human Resource Advisor will ensure the recruitment and termination process does not take into consideration union status or any other discriminative factors. |
| REASONABLE REQUEST BY DELEGATE TO REPRESENT | Bridgeman will not refuse a reasonable request by workplace delegates to represent employees in relation to grievances and disputes or discussions with a member, or potential member, of a building association. | Bridgeman will ensure reasonable requests will not be refused during a dispute resolution process. All requests from a workplace delegate regarding representation rights, will be communicated to the Human Resource Advisor such that Bridgeman can ensure that the person is identified as a bona fide representative on industrial matters and that grievances, disputes or discussions are progressed in a reasonable timeframe and manner and not unreasonably refused. |
| NON-WORKING SHOP STEWARD | Bridgeman will not employ a non-working shop steward or job delegates. Bridgeman will not permit the imposition, or attempted imposition, of a requirement for any employer on site to employ a non-working shop steward or delegate or to hire an individual nominated by a union. | The Project Manager will ensure that this does not take place and the Human Resource Advisor will manage the recruitment process and monitor the subcontractor approval process strictly. |
| LOGOS AND INDICIA | Building association logos, mottos or other indicia are not applied to the Bridgeman's property or equipment, or to clothing supplied or provided for by Bridgeman. | The Project management team will monitor the condition of a Project and site facilities to ensure that prohibited material is not displayed. This will be communicated during the onsite induction process by the HSE Advisor. |
| BARGAINING FEE | Bridgeman will ensure that individuals will not be required to pay a 'bargaining fee' (howsoever described) to a building association of which the individual is not a member, in respect of services provided by the association. | Bridgeman will provide this information during the inductions regarding coercion and the right to Freedom of Association. This is also shown in the Employee and Industrial Relations Policy displayed throughout the site. |

PART J – ENTRY TO PREMISES

Union right of entry onto site will be managed strictly in accordance with the law.

Bridgeman is responsible for complying with 'Union Right of Entry' responsibilities under section 14 of the Building Code 2016, the relevant state IR Guidelines, the Fair Work Act 2009 and Work Health and Safety Act 2011.

All subcontractors and employees on the Project are made aware of their obligations regarding Right of Entry during the site induction process. The information is also documented in prominent positions around the site displaying the Bridgeman Right of Entry – which will comply with all relevant legislations.

To ensure the Union Right of Entry process works smoothly, We will comply with all laws of the Commonwealth and each relevant State and Territory that apply and give a permit holder a right to enter premises.

- All officers of building associations who attend the Project will be required to produce their relevant permits.
- We will so far as is reasonably practicable ensure that officers of building associations only enter the site for a purpose for which a right of entry could be exercised under Part 3-4 of the Fair Work Act 2009 or a relevant work health and safety law and only where the applicable legislative requirements in those laws have been strictly complied with.
- We will maintain copies of entry notices issued in relation to the Project and require subcontractors to provide a copy of any entry notices they received to site management.
- We will maintain a record of any attendance of an officer of a building association to the Project.
- All visitors and officers of building associations who attend the Project will be required to comply with the site safety requirements that apply, including completing and signing the visitor register.
- We will ensure, as far as is reasonably practicable, that the site is secure from trespassers.

We will monitor the site for unauthorised entry and take appropriate action in response to unauthorised access. For example by, as far as is reasonably practicable, requiring unauthorised entrants to leave immediately.

J1. – SITE SECURITY

Security will be managed on a project site by the following:

- Prior to site mobilisation, an assessment of the potential for security breaches will be undertaken by the Project Manager and a plan developed which will address measures to ensure controlled access during working hours, security of the site after hours and any unusual aspects or geographical features which could compromise controlled access to the site;
- This plan will also incorporate measures to ensure public safety and safe access and egress while respecting and protecting the local community;

- The site compound where the office, crib room, toilets and training rooms etc are located, will be secured by a lockable fence with a security system (where possible);
- Any sensitive material will be secured in lockable cabinets and valuable materials secured in a lockable sea container;
 - All personnel (employees and subcontractor employees) on site must be inducted and will be provided with an induction card and/or a helmet sticker to identify themselves as having been inducted;
 - At induction, all personnel will be advised to report suspected or actual unauthorised entry to the Project site or office immediately by two-way radio to the Site Supervisor;
 - All personnel on site will attend the pre-start talk at the start of every shift where they will sign the prestart form and this will provide a list of personnel whom are authorised to work during on site for the shift.

Methods for identification and notification of unauthorised entry:

- Adequate signage is displayed on the site fences and buildings to direct visitors, deliveries and other unauthorised personnel to direct them to the site office for assistance;
- All personnel on site must have correct PPE (hard hat, high vis clothing, steel cap boots);
- Bridgeman site specific induction sticker / card must be displayed on the hard hat or an induction card must be shown upon request;
- Any personnel identified without the above identification mechanisms will be reported to the Site Supervisor immediately who will promptly remove the unauthorised person from site or transport them to the site office for completion of the Bridgeman Induction (to be held by the HSE Advisor);
 - All induction records and confidential information is maintained electronically within the secure Bridgeman document management system and is accessible by the Project Manager and HSE Advisor.

PART K – GRIEVANCE MANAGEMENT

K1. – DIRECT EMPLOYEES

Bridgeman has established the following procedures for managing grievances in the workplace:

- ***Communication and Grievance Policy***

The Project Manager is responsible for recording details of any grievances from staff or subcontractors and supplying this information to the Bridgeman Human Resources Advisor for advice and support in resolving the issue.

Data from all complaints or grievances will be compiled and analysed to understand the nature and frequency of grievances amongst both employees and subcontractors.

The Project Manager will therefore be better informed to proactively address issues and where applicable prevent grievances arising in the future.

Freedom of Association in representational rights is advised to all site employees during the

induction as noted elsewhere. Freedom of Association will also be communicated by the Project Manager and/or Human Resource Advisor to personnel at the time of being notified of a grievance and the complainant's ability to change that choice at any time during the process will be made clear.

Employees may exercise their right to be represented or supported by a person of their choice, at any stage in the process whether that be from a building association or any other representative.

Bridgeman will, in accordance with the Building Code 2016 and relevant state IR Guidelines, notify the client representative immediately of any grievance or action that is expected to impact the Project schedule, timeline or costs.

K2. – SUBCONTRACTORS

Subcontractors will be asked to declare that they comply with all provisions and requirements consistent with the Building Code 2016 and relevant state IR Guidelines, which will be assessed by the Human Resources Advisor.

Subcontractors will also be advised that they are to notify the Site Supervisor and/or the Project Manager in writing immediately following the receipt of any claim or grievance from one of their own employees or subcontractors if this grievance has occurred whilst working on the Project, or if the grievance is expected to impact the Project in any way.

The subcontractor will be required to provide details of the grievance, the scope of the grievance, the expected impact of the grievance process on the Project and an expected timeframe for resolution.

K3. – GRIEVANCE REPORTING

If any grievances or disputes are likely to result in a breach of the Building Code 2016, the relevant state IR Guidelines or the Fair Work Act 2009, such as industrial action or a breach of the Work Health and Safety Act, the Project Manager will notify the Human Resource Advisor immediately who will then notify the relevant governing bodies.

PART L – INDUSTRIAL IMPACTS

Bridgeman will report actual or threatened industrial action (whether protected or unprotected) on the project by our employees to the ABCC as soon as practicable, but no later than 24 hours, after becoming aware of the threat or action.

- We will, to the extent reasonably practicable, take steps to prevent or bring an end to industrial action that is not protected action taken by our employees on the project (depending on the circumstances this may involve taking legal action in the Fair Work Commission or a court where remedies are available).
- We will ensure subcontractors, as far as is reasonably practicable, take steps to prevent or bring an end to industrial action that is not protected action taken by their employees on the project (depending on the circumstances this may involve taking legal action in the Fair Work Commission or a court where remedies are available).
- We will ensure that we comply with laws relating to payments to employees during periods of industrial action (strike pay) and we will take reasonable steps to verify that subcontractors comply with laws relating to payments to employees during periods of industrial action.

- When unlawful or potentially unlawful industrial action is threatened, we will take reasonable steps to advise participants of the potential consequences and lawful alternatives.
- We will keep records of any actual or threatened industrial action.

PART M – COMPLIANCE WITH THE BUILDING CODE 2016

Bridgeman will endeavour to ensure the Project operates in accordance with the requirements of the Building Code 2016.

M1. – REPORTING

Bridgeman will ensure that section 17 of the Building Code 2016 is followed strictly as per below:

- The Human Resource Advisor will notify the ABCC of a breach or suspected breach as soon as practicable, but no later than 2 working days after the Company becomes aware of the breach or suspected breach;
- The Human Resource Advisor will ensure that it notifies the ABCC of the steps that it has taken or is intending to take in order to rectify the breach and the outcome of such actions; and
- Within 14 days of the breach or suspected breach, the Human Resource Advisor will update the ABCC on the steps it has taken to rectify the breach and the outcomes of such actions.

M2. – ACTIONS AND BEHAVIOURS ON SITE

As the first point of communication with all personnel, the on-site induction will include and ensure provisions of the Building Code 2016 are communicated to all employees, subcontractor employees and visitors. Building Code 2016 compliance will be promoted in the induction and via onsite posters informing people on site of the Right of Entry guidelines as well as information regarding the requirements of Freedom of Association.

M3. – AUDITS AND REVIEWS

The Human Resource Advisor will monitor compliance with the WRMP on a regular basis in conjunction with the Project Manager.

A review of the WRMP will be conducted within three months of the commencement of a Project and then on an as-required basis periodically throughout the delivery of the Project. As required Bridgeman will undertake a review of the wage rates and a payroll report consisting of Bridgeman's employees' wages and allowances to ensure no overpayments or underpayments are made.

The Human Resource Advisor will check to ensure correct wage rates and allowances are paid in accordance with the EA and that over and underpayments are not made. Any errors, if found will be corrected. An audit is undertaken by the Human Resource Manager bi-annually and throughout the annual review process to ensure wages and allowances are made in accordance with legal requirements.

PART N – FITNESS FOR WORK POLICY

Refer to Bridgemans following policies:

- *Fitness for Work Policy*
- *Employee Alcohol and Drug Policy*

Compliance with the Fitness for Work Policy is enforced through the following methods and provides Bridgeman with the right to remove any person from a Project if they don't comply:

- Employees are bound through their employment contract to comply with all Bridgeman policies and procedures; and
 - Compliance by Subcontractors and Consultants is enforced through the subcontractor or consultant's formal contract agreement.

Visitors are required to undertake a visitor induction which outlines the compliance requirements for the Fitness for Work Policy and are escorted at all times on site during their stay.

PART O – SECURITY OF PAYMENTS

Bridgeman will train all relevant staff who process payments to subcontractors on the requirements of the security of payment laws in Queensland or the relevant state to ensure we comply with the security of payment law.

- We will ensure subcontracts provide for payment terms in accordance with the relevant security of payment law.
- We will comply with all applicable laws and other requirements relating to the security of payments that are due to persons.
- We will ensure that payments which are due and payable are made in a timely manner and are not unreasonably withheld.
- We will have a documented dispute settlement process that details how disputes about payments to subcontractors will be resolved.
- We will ensure that our documented dispute settlement process detailing how disputes about payments to subcontractors will be resolved includes a referral process to an independent adjudicator for determination if the dispute cannot be resolved between the parties.
- We will, as far as practicable, ensure that disputes about payments are resolved in a reasonable, timely and cooperative way.
- We will report disputed or delayed progress payments to the ABC Commissioner and the relevant funding entity (if any) as soon as practicable. The obligation to report a disputed or delayed payment may arise when:
 - An amount is certified by a Principal (or Superintendent) under a contract and not paid within the contractual timeframe.
 - An amount is specified in a payment schedule/notice of dispute issued under the security of payment laws and not paid by the date prescribed by those laws.

- Other than in Western Australia and the Northern Territory, no payment schedule/notice of dispute is issued in response to a valid payment claim and the full amount of the payment claim is not paid by the date prescribed by the security of payment laws.
- An adjudicator makes a determination under the relevant state and territory security of payment legislation and the adjudicated amount is not paid by the date prescribed by the security of payment laws.
- A third party such as a court, arbitrator, or expert issues a binding determination and the amount determined is not paid in accordance with the determination.
- We will comply with any requirements relating to the operation of any project bank account or trust arrangement that apply to the Code covered entity in relation to Commonwealth funded building work.
- We will not unduly influence, unduly pressure or coerce subcontractors in relation to the exercise of their rights under security of payments laws

PART P – COMPLIANCE WITH THE CODE AND WRMP

We will ensure all relevant staff are trained in the requirements of this WRMP.

- We will ensure that a copy of this WRMP is kept on site and is readily available for any employee or subcontractor to view.
- We will regularly (at least biannually) audit our compliance with the Code and this WRMP.
- We will promote compliance with the Code and the WRMP at site inductions, site meetings, subcontractor meetings and toolbox meetings.

Appendix A – PROJECT ORGANISATION CHART

< INSERT ORGANISATIONAL CHART FOR TENDER SUBMISSION >

Appendix 1 – FREEDOM OF ASSOCIATION

Schedule 13 of the *Code for the Tendering and Performance of Building Work 2016*

- (1) A code covered entity must protect freedom of association in respect of building work by adopting and implementing policies and practices that:
 - (a) ensure that persons are:
 - i. free to become, or not become, members of building associations; and
 - ii. free to be represented, or not represented, by building associations; and
 - iii. free to participate, or not participate, in lawful industrial activities; and
 - iv. not discriminated against in respect of benefits in the workplace because they are, or are not, members of a building association.
- (2) Without limiting subsection (1), the code covered entity must ensure that:
 - (a) personal information is dealt with in accordance with the *Privacy Act 1988* and the *Fair Work Act 2009*; and
 - (b) 'no ticket, no start' signs, or similar, are not displayed and such arrangements are not implemented; and
 - (c) signs that seek to vilify or harass employees who participate, or do not participate, in industrial activities are not displayed; and
 - (d) 'show card' days do not occur; and
 - (e) there is:
 - i. no discrimination against elected employee representatives; and
 - ii. no disadvantage to elected employee representatives; and
 - (f) forms are not used to require:
 - i. an employee to identify whether they are a member of a building association; or
 - ii. a subcontractor to identify whether the contractor or its employees or subcontractors are a member of a building association; and
 - (g) practices that are not authorised by law which require, directly or indirectly, a person to disclose whether or not they are a member of a building association, are not engaged in; and
 - (h) individuals are not refused employment or engagement because they are, or are not, a member of a building association; and

- (i) the employment of employees or engagement of subcontractors is not terminated because they are, or are not, a member of a building association; and
- (j) building association logos, mottos or indicia are not applied to clothing, property or equipment supplied by, or which provision is made for by, the employer or any other conduct which implies that membership of a building association is anything other than an individual choice for each employee; and
- (k) reasonable requests from a workplace delegate to represent an employee of the code covered entity in relation to a grievance, a dispute or a discussion with a member of a building association are not refused; and
- (l) requirements are not imposed, or attempted to be imposed, on the code covered entity or a subcontractor engaged by the code covered entity to:
 - i. employ a non-working shop steward or job delegate; or
 - ii. hire an individual nominated by a building association
- (m) the code covered entity does not employ a non-working shop steward or job delegate; and
- (n) individuals are not required to pay a 'bargaining fee' (howsoever described) to a building association of which the individual is not a member, in respect of services provided by the association; and
- (o) employees must be provided a freedom of choice in deciding whether to be represented in grievance or dispute procedures (whether or not pursuant to an enterprise agreement), and, if so, by whom; and
- (p) officials, delegates, or other representatives of a building association do not undertake or administer induction processes.

Appendix 2 – FITNESS FOR WORK / ALCOHOL AND OTHER DRUGS IN THE WORKPLACE

Schedule 4 of the *Code for the Tendering and Performance of Building Work 2016*

The fitness for work policy referred to in paragraph 32(2)(a) must address: ensure that persons are:

- (1) how those on site (including employees of the head contractor, subcontractors and their employees and others) will be required to comply with the relevant fitness for work policy (i.e. through contract or some other enforceable means).
- (2) the use of an objective medical testing method/s to detect the presence of drugs or alcohol in a worker's system and outline the detection method/s to be used on the project.
- (3) the requirement that all of the following substances are tested for:
 - i. Alcohol;
 - ii. Opiates;
 - iii. THC;
 - iv. Cocaine;
 - v. Benzodiazepines;
 - vi. Amphetamine; and
 - vii. Methamphetamine.
- (4) that a person who returns a positive result for any of the substances listed above will be deemed not to be fit for work (in respect of each substance listed above, subject to testing detectable levels, there is a zero level tolerance).
- (5) how a person who returns a positive result will be prevented from performing work until they can prove they are fit to return to work, and other processes that will apply in the event of a positive result or deemed positive result (i.e. a failure to submit to a test).
- (6) the requirement that, as a minimum, frequent and periodic testing (at least once per month) of the workforce (both construction workers and site office workers) will be as follows:
 - i. where there are less than 30 workers on site – at least 10% of the workforce;
 - ii. where there are 30 to 100 workers on site – a minimum of 5 workers per month; and
 - iii. where there are greater than 100 workers on site – a minimum of 10 workers per month.
- (7) procedures for the selection of personnel to be tested (including staged selection across a worksite or random selection for testing if the entire workforce is not to be tested in a testing round).
- (8) procedures for the targeted testing of higher-risk activities, voluntary testing and for-cause testing.
- (9) how workers who attend for work affected by drugs or alcohol will be counselled and assisted, apart from any disciplinary process that might apply.