

Health, Safety & Environmental ISO Compliance Management Procedure

WNH Q16 - Revision 2.0

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Revision History

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1.0 This Document

1.1 Purpose

The purpose of this procedure is to outline the health, safety and environmental management expectations of Woolnorth Renewables (WNR) and to demonstrate and describe how WNR meets the requirements of the AS/NZS ISO 45001:2018 Occupational health and safety management systems – Requirements with guidance for use and the AS/NZS ISO 14001:2016 Environmental management systems – Requirements with guidance for use.

1.2 Scope

This procedure applies to all aspects of the WNR business, any worksite managed by WNR, and any personnel engaged or invited by WNR to conduct activities on behalf of WNR.

2.0 Introduction

WNR's Health, Safety and Environmental (HSE) Management System (HSE System) provides specific documentation to ensure the business's HSE aspects, impacts and risks are managed to an acceptable level (as determined by WNR). The management system is also intended to identify and implement opportunities where they exist or when they arise. The system documentation describes the governance, processes and accountabilities that are applied in order to manage these HSE risks and opportunities, and, ensure alignment and compliance with AS/NZS ISO 14001 & 45001. Where appropriate, a description of the policies, procedures and processes that WNR applies to meet the intent of these standards and the WNR Environmental and, Health and Safety Policies, is provided.

3.0 Not used

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4.0 Context Of the Organisation

4.1 Understanding the Organisation & Its Context

The company HSE risk registers are used to document and summarise all internal and external environmental (i.e. aspects and impacts), occupational health and safety, and relevant stakeholder (interested party) risks that are significant to the business. They also provide insight into the conditions included in the organisation's environmental regulatory permits and approvals, which have a direct impact on the organisation and the way it operates. In Tasmania no overarching business or project level permits or authorisations are utilised by regulatory authorities relating to Health and Safety, rather this area falls under general statutory law (e.g. Tasmanian Work Health & Safety Act)

4.2 Understanding the Needs & Expectations of Interested Parties

Individuals, informal groups, organisations and regulatory authorities all represent interested parties in relation to the HSE Management System for the business and are listed as stakeholders in the HSE risk registers. These stakeholders include:

- The WNR Board
- WNR employees
- Direct contractors/sub-contractors
- Hydro Tasmania
- Shenhua Clean Energy Holdings
- The Tasmania Environment Protection Authority
- The Commonwealth Department of Climate Change, Energy, the Environment & Water (DCCEEW)
- Tasmanian Department of Natural Resources and Environment Tasmania
- Tasmanian Department of WorkSafe Tasmania
- BirdLife Australia – BirdLife Tasmania (Tasmanian division)
- Property Licensees
- Natural Resource Management North (NRM North)
- Melaythenner Teeackana Warrana Aboriginal Corporation (MTWAC)
- Circular Head Aboriginal Corporation (CHAC)
- Tasmanian Aboriginal Centre (TAC)
- Woolnorth Tours
- Tasmanian National Park and Wildlife Service
- Adjoining/neighbouring landowners
- Circular Head Council
- Dorset Council
- IdentiFlight/Boulder Imaging
- Other wind farm owners/operators in Tasmania

In relation to the HSE Management System, the above interested parties are likely to expect WNR to implement sound health, safety and environmental management practices, ensure compliance with any specific laws or legal documents and manage our operational risks to as low as reasonably practicable. Some of these interested parties expect that WNR will develop and act on opportunities that arise to lower operational risks.

WNR takes the view that the environmental compliance obligations on the business are clear and are well documented through our permits and approvals for each wind farm. Similarly, while a lot less specific, the regulatory and compliance obligations on the business relating to health and safety are well defined through the Tasmanian Work Health & Safety Act and associated subordinate documents (regulation, codes of practice etc). Other needs and expectations are considered discretionary.

4.3 Determining the Scope of the Health, Safety & Environmental Management System

The WNR HSE System is applicable to the operation, maintenance, administration and management of all the operational wind farm generation facilities, associated infrastructure (such as transmission lines, roads, buildings and visitor centres) and the immediate environment including the land which we own, lease and license. With respect to licensees (other parties with a legally binding right to undertake certain activities) that operate on land owned or leased by WNR, the scope of the HSE System extends to the extent the company can assert influence over the management approaches and practices of the licensee.

The HSE System shall therefore be practically implemented at Bluff Point Wind Farm (located at 1665 Woolnorth Road, Woolnorth TAS 7330), Studland Bay Wind Farm (located at 1227 Woolnorth Road, Woolnorth, TAS, 7330) and Musselroe Wind Farm (2098 Cape Portland Rd, Cape Portland, TAS, 7264) and principally administered from the Launceston Head office (Level 2, 33 George Street, Launceston, TAS, 7250). The HSE System is also applicable and shall be implemented for all operation and maintenance activities associated with the transmission line infrastructure owned by WNR to connect the above-mentioned wind farms to the transmission network. Specifically, the latter means the transmission line between Bluff Point and Studland Bay Wind Farms and the termination point at the Smithton sub-station (owned and operated by TasNetworks) and the transmission line between Musselroe Wind and the termination point at the Derby sub-station (owned and operated by TasNetworks).

The scope of the HSE System includes documented information covering:

- The identification, management and influence of HSE issues, both external and internal, identified through the identification and management of HSE impacts and opportunities.
- How these external and internal issues can impact business activities, stakeholders, communities and in particular areas of higher HSE risk.
- Identifying, understanding and responding to the needs and expectations of interested parties/stakeholders including those of the business's workers.
- Fulfilment of identified compliance obligations including the needs of interested parties/stakeholders and workers.
- Continual HSE performance improvement through monitoring, review and implementation of controls.

4.4 HSE Management System Documentation

WNR's HSE System provides specific documentation to ensure all of its known and unknown HSE risks are managed to as low as reasonably practicable (as determined by WNR). This documentation is also intended to seek and implement opportunities for improvement where they exist and when they arise, and describes the

governance, processes and accountabilities that are applied in order to manage HSE risks and opportunities in alignment with the AS/NZS ISO 14001 and 45001.

5.0 Leadership & Worker Participation

5.1 Leadership & Commitment

As a business, WNR is relatively small, consisting of a CEO, three managers (HSE, Operations & Finance) and typically 30-35 technical, advisory and supervisors staff. Because the nature of the environmental risks associated with the business are generally low (as per corporate HSE Risk Register) there is limited need for “Top Management” to take an active role in Environmental matters. In relation to Health and Safety concerns, the risks are a lot higher and, therefore, require more active intervention from the entire management team. All managers, including the HSE Manager, report directly to the CEO and the HSE Manager liaises directly with all other members of the business.

Leadership and commitment to health & safety management is demonstrated by:

- being accountable for ensuring the application of the management system,
- preparing, authorising and supporting the policies of the business,
- ensuring the management system processes and requirements are included in operations and business processes,
- supporting and referring matters to the specific HSE resources of the business and ensuring work teams have sufficient resources to implement the necessary parts and/or requirements of the HSE system,
- supporting the methods used to communicate the importance of the management system and to conform with its requirements,
- ensuring the management system is meeting its needs through active participation in the review processes,
- as required, being directly involved in the management system and supporting improvement measures,

The HSE Manager is assigned the responsibility and authority for ensuring the HSE System meets the requirement of ISO14001 and ISO45001 and reporting on performance of the management system.

5.2 HSE Policies

The Environmental Policy and Health and Safety Policy establish specific commitments relevant to the activities undertaken by WNR. Both policies are communicated to all staff and contractors working for/or on behalf of WNR, and it is displayed on the company website. These policies are reviewed no more than three yearly or within a shorter timeframe where a need to review is identified.

Changes that require review and updates to the Environmental, and Health and Safety policies include:

- Appointment of new CEO or other significant leadership change;
- Significant changes in the functional structure of the organisation;
- Reduced or expanded business operations; and
- Change to ISO14001 or ISO45001 standards where the policy requirements are amended.

5.3 Organisation Roles, Responsibilities & Authorities

The CEO of WNR has overall responsibility regarding Health, Safety and Environmental management and compliance. WNR managers and staff assist the CEO to ensure that compliance with general law and specific permit and approval requirements are upheld.

Core to the HSE System deployment is a dedicated HSE team to ensure that all activities are undertaken in accordance with the company's legal and system requirements.

All HSE System documents contain information on roles and responsibilities.

5.4 Consultation & Participation of Workers

The WNR HSE system and management approach acts to foster a strong culture of consultation and participation across all levels of the organisation. The company maintains open and transparent communication channels between management, workers, and contractors to identify, assess, and control health and safety risks. Workers are actively involved in safety planning, hazard identification, and incident investigations, with their feedback directly influencing operational procedures and continuous improvement initiatives. Regular toolbox meetings, quarterly HSE team leadership meetings, and other formal consultation processes provide structured opportunities for employees to contribute to decision-making on matters that affect their health and safety. This participative approach not only aligns with ISO 45001 requirements but also reinforces a shared responsibility for maintaining a safe and sustainable workplace within the unique environmental and operational context of Tasmania's renewable energy industry.

6.0 Planning

6.1 Actions to Address & Opportunities

6.1.1 General

The management system followed and implemented by WNR addresses the internal and external issues and expectations of stakeholders relevant to the organisation. It also assists WNR address compliance obligations. The management system is consistent with and meets the requirements of the documented scope of the system.

The system assists in the determination of risks and opportunities that are related to WNR's aspects, compliance obligations and other issues. These risks and opportunities are documented as described in section 6.1.2.

6.1.2 Hazard Identification & Assessment of Risks & Opportunities

6.1.2.1 Hazard Identification

Environmental risks and opportunities are described through the determination of 'aspects' and 'impacts'. An environmental aspect defined as an element of an activity, product or service, undertaken by WNR, that can interact with the environment and an impact being any change to the environment, whether adverse or beneficial, wholly or partially resulting from activities, products, or services of WNR. A life cycle perspective is considered where at all possible. These features of environmental management are regarded as "risks and opportunities" with WNR's HSE System. Similarly, the Health and Safety considerations of the business are also regarded as risks and opportunities.

WNR determines and documents corporate level HSE risks and opportunities following the approaches outlined in WNH Q14 Risk Management Procedure. The corporate HSE risk register (as opposed to site-based registers) is reviewed annually, and the review process includes forecast or known changes to WNR's operations, abnormal conditions and reasonably foreseeable emergency situations.

When significant risks are identified by WNR, the organisation commits to implementing actions in a timely fashion. Significant risks are considered by WNR as those risks where a moderate or above exposure remains after reasonably practicable controls have been implemented. Additional control measures may be implemented for these. Depending on the level of risk exposure WNR may implement a control measure immediately or through its annual program of setting objectives and targets. Other risks and opportunities, which are not regarded as significant, but are not considered acceptable will be controlled in the same manner.

WNR's environmental objectives and targets are documented in the annual HSE Plan and through various other documents and levels of the organisation. This HSE Plan is covered fortnightly in face-to-face meetings with the CEO, which includes updates and changes to reflect continuous improvement opportunities.

6.1.2.2 Assessment of HSE risks and Other Risks to the HSE Management System

All HSE risks and broader considerations and risks that impact or influence the HSE System are assessed and management in accordance with WNR's Risk Management Procedure (WNH Q14). This procedure ensures that the assessment of HSE risks during the planning phase of any activity considers the establishment, implementation, operation, maintenance, demobilisation and restoration aspects of the task or activities being planned.

6.1.2.3 Assessment of HSE opportunities and Other Opportunities for the HSE Management System

The business manages HSE opportunities at every level through a highly collaborative approach to risk management that ensures a focus on continuous improvement. This is evident in the “Top Level” management reviews of the HSE System through to the Risk Management Procedure (WNH Q14) and consultations that regularly take place between HSE representatives, managers and workers within the business.

6.1.3 Determination of Legal Requirements & Other Requirements

WNR maintains a register of corporate level legal and compliance requirements relevant to the operation of its business and assets. Because the majority of environmental requirements are attached to the approval of projects, an equivalent register is also maintained for each wind farm. In comparison, specific health and safety requirements are typically not issued directly to Tasmanian businesses or projects and therefore such compliance risks are outlined at the corporate level only.

WNR also has obligations to comply with general State and Commonwealth laws. Specific requirements to these laws have not been condensed into a single register. Compliance is broadly achieved through compliance with the HSE Management System, State and Commonwealth Permits and Approvals and site health & safety management plans.

Legal and Policy Updates are received from Environmental Essentials and each month WNR review these for changes to legislation and regulations, as well as through contact with industry forums. Relevant information from these updates is provided to the WNR CEO and if required the broader business.

Legal HSE requirements are taken into account during WNR’s operational and maintenance planning processes, and investigations into legal compliance are undertaken as required (e.g. requirements of certain laws or Australian Standards).

Annual environmental reports are produced for each project/wind farm and these document much of the legal compliance.

6.1.4 Planning Action

WNR addresses risks and opportunities at various levels in the organisation. These are documented in various documents including the annual HSE Management Plan but also in site-based HSE management plans (internal and regulatory approved Management Plans). These documents address environmental aspects, impacts and compliance obligations.

Where necessary the actions outlined in these documents are transferred into operational documents, controls inserted into the management system or managed through business processes.

6.2 HSE Objectives & Planning to Achieve Them

6.2.1 HSE Objectives

WNR establishes, maintains and tracks its performance against HSE objectives and targets which are defined in the annual HSE Plan. These are developed through regular reviews of HSE performance and reference to the WNR risk and compliance registers. The HSE Plan is reported on fortnightly in submissions to the CEO.

In addition, objectives, targets and programs feature strongly in site-based environmental management plans (internal and Regulatory approved plans). These plans deal with many of the core risks and issues relevant to the WNR operation.

Monitoring and Reporting against objectives, targets and programs is completed in many ways including monthly internal reports, standalone reports and publicly available Annual Environmental Reports (and Public Environmental Reports every three years).

6.2.2 Planning to Achieve HSE Objectives

The various mechanisms outlined above are the conduits for action. These mechanisms document what will be done, what resources are required, who is responsible, when it will be completed and an evaluation process or a commitment to assess the results of a specific action or group of actions.

7.0 Support

7.1 Resources

WNR has determined and provided resources to manage its HSE Management System including risks and opportunities, compliance obligations and provision of operational support to WNR operations. The current resource allocation is 3.2 FTE, but this is continuously tracked and if required increased.

7.2 Competence

Competence is considered at various levels within the organisation from the recruitment phase through to the job planning phase including contractor engagement. WNR identifies training and competence requirements of its staff, various records are maintained to document what training has been conducted and when. A training plan is used to document what HSE orientated training an individual should ideally receive. Competency is also tested and checked through the induction process and the implementation of the annual audit and emergency preparedness schedules.

7.3 Awareness

HSE awareness is principally managed through the induction process. Other mechanisms used to increase awareness of the HSE topics relevant to the business include noticeboards, toolbox meetings, asset signage, emergency preparedness and topic specific training.

7.4 Communication

7.4.1 General

WNR communicates HSE matters relevant to their operations extensively, both internally and externally, to ensure a collaborative approach to continuous improvement. WNR have established processes for communicating the contents of the HSE Management System, other information relevant to the HSE Management System, compliance obligations and requirements and operational documents and records. WNR also has also established processes for external communications.

7.4.2 Internal

Internal communications are carried out through various mechanisms:

- Induction processes
- Regular WNR meetings (formal and informal)
- Site notice boards
- Internal memos
- Quarterly site HSE meetings
- Toolbox meetings
- Site Management Pages
- System change advice
- Incident notification advice

- Monthly HSE reports
- Monthly reporting to the Board of Directors

7.4.3 External

WNR communicates relevant information externally including information relevant to the HSE Management System but also information relevant to its compliance obligations.

WNR do this through the external website www.woolnorthrenewables.com.au. The HSE Management System is available via the WNR website. WNR produces an annual environmental report for all wind farm operations which is publicly available via the website. Every three years a Public Environment Report is also produced and includes an expanded amount of information regarding environmental management, performance and compliance. This document is provided to various stakeholders and to the general public on request.

A website, a free call 1800 number and general enquiry email address have been established. The latter are listed on the WNR website.

7.5 Documented Information

7.5.1 General

Through the established HSE Management System, WNR have a suite of documents available to manage and reduce the HSE risks and impacts of its operations. This documentation is available via the WNR website – www.woolnorthrenewables.com.au.

7.5.2 Creating & Updating

WNR documents are managed (created and updated) through the application of a document control process which includes change management and communication. The WNR document management process is evolving but is relatively well established. Relevant documents are held in the Controlled Documents folders of the WNR SharePoint site.

7.5.3 Control of Documented Information

Central management of the system is conducted by WNR. The management system documents are stored electronically in WNR's document management system. The repository has restricted permissions with only certain individuals provided edit rights. General access to the system is provided through the WNR website. Various processes are in place to manage version control. Documents are communicated to relevant staff and staff are encouraged to take documents from the central locations (such as the internet) where the latest copies of documents are maintained.

As indicated WNR has a document management system (SharePoint), and this is used to hold all HSE documents and records. System records and documents retained include legal compliance, correspondence, incidents records, audit records and objectives and targets for example.

8.0 Operation

8.1 Operational Planning & Control

8.1.1 General

WNR has numerous operational documents that assist it to manage its HSE risks and legal requirements, opportunities, commitments and controls. These documents are made available either via the WNR website or intranet pages. They include permits, procedures, forms, management plans and protocols.

Operational documents that establish controls to manage environmental impacts are completed for specific tasks and jobs such as JHAs, Work instructions and Safe Work Method statements. These documents are designed to address the full range of HSE risks and concerns. WNR also develops other job specific documents as required.

Where specific HSE requirements are needed these are communicated to contractors or suppliers through the contractor management process.

8.1.2 Eliminating Hazards & Reducing HSE Risk

The elimination of hazards and the hierarchy of controls is a central tenet of the Risk Management Procedure. The hierarchy of controls is also provided on the templates for the Job Hazard Analyses which is WNR's primary operational risk management template.

8.1.3 Management of Change

The management of change as a risk or opportunity is facilitated through the standard risk management processes and collaborative assessments of risk and opportunity conducted through management reviews, HSE site meetings and toolbox meetings. The document quality management system ensures that permanent change is captured within the business system.

8.1.4 Procurement

General

The procurement of products and services is managed through a defined procurement system that outlines the scope and quantity of the purchase, the supply period and the unit costs. HSE risks in this process are managed through a standard procurement contract that references the business's HSE requirements and the HSE System available on its public website.

Contractors

Contractors are recognised as a significant risk to the business and given considerable attention in relation to managing their HSE awareness and compliance. This is primarily achieved through a staged online induction system that has been developed to reflect the range of operational and compliance risks that contractors to WNR will be faced with. Contractor HSE management is also addressed internally through a specific training package delivered to all staff responsible for managing contractors.

Outsourcing

The outsourcing of services is treated the same as the procurement of products, that is, through the defined procurement system and template procurement contract that references the HSE system. This approach is proportionate to the HSE risks that the off-site provision of services represents.

8.2 Emergency Preparedness & Response

WNR's emergency preparedness training is conducted in accordance with system procedure WNH Q29 Incident Response, Management & Investigation Procedure. An Emergency Response Plan is available at each WNR operational wind farm site, which is regularly updated (at least every three years). A preparedness schedule is held in the WNR HSE Management spreadsheets and emergency sessions are run accordingly. The emergency preparedness schedule aims to address and test the emergency scenarios that are most likely to eventuate during or as a part of WNR operations. Emergency scenario desktop sessions are conducted regularly throughout the year. This document, the Incident Response, Management and Investigation Procedure (WNH Q29), also provides guidance on incident investigation, with severity triggers designed to provide an appropriate level of management and investigation proportional to each event.

9.0 Performance Evaluation

9.1 Monitoring, Measuring, Analysis & Evaluation

9.1.1 General

Monitoring and measuring in relation to activities that can have an HSE impact is required as part of specific operational documents and environmental management plans. These documents, in most cases, outline what is monitored/measured, the methods for monitoring and measuring, when it is done and how the analysis and evaluation will be performed. On a case-by-case basis WNR may need to establish specific methods or criteria for aspects or issues to be monitored, measured, analysed or evaluated.

WNR monitors a range of HSE concerns and metrics. Many of these are reported on annually through a publicly available environmental reports, as already described, which include avian, weed, vegetation growth, fuel usage, site waste, SF6 volumes, energy consumption and energy production. Health and safety metrics and performance are updated and reported monthly to the management team and Board of Directors.

9.1.2 Evaluation of Compliance

Regulatory compliance is managed through various registers both at the corporate and site levels. These registers hold all permit and management plan commitments and are maintained for each site and reviewed at least annually. The internal audit plan focusses on the key HSE risks for the business and the range of compliance obligations it holds. Regulatory authorities and ISO auditors also conduct independent audits to verify compliance. Records of compliance evaluations and audits are maintained in the WNR HSE Management spreadsheets.

9.2 Internal audit

9.2.1 General

WNR schedules regular internal audits to evaluate its compliance against legal requirements. In addition to compliance with legal requirements the internal audit program conducts internal audits to assess the implementation and effectiveness of the HSE Management System against the documented requirements of the system as well as the requirements of AS/NZS ISO14001:2016 and AS/NZS ISO45001:2018.

9.2.2 Internal Audit Program

The internal audit plan is developed based on risks identified in the strategic risk register and previous audit plans. The annual schedule of internal audits is documented in the HSE Management spreadsheets. Internal audits are conducted by suitably qualified and experienced personnel and with a view to maintain objectivity and impartiality of the audit process. Audit reports are documented and the findings, including any non-conformances, identified are communicated to the auditees. Audit outcomes are logged in the WNR HSE Management spreadsheets. The implementation of corrective actions or opportunities for improvement are monitored regularly by management. Audit actions are not to be closed without evidence of the action being completed. Audits are conducted in accordance with HSE Audit and Inspection Procedure (WNH Q31).

9.3 Management Review

A management review is undertaken every 3 years (as of November 2016) in accordance with the AS/NZS ISO 14001:2016 and 45001:2018. This review is documented. Fortnightly reviews of system performance and HSE issues are also conducted with the CEO, and monthly HSE reports provided to the Board of Directors.

10.0 Improvement

10.1 General

As outlined in Section 9 and in other places in this document, WNR have numerous processes to identify and seek improvements in HSE Management. Additionally, processes exist for the implementation of the necessary actions identified.

10.2 Nonconformity & Corrective Action

Various documents support WNR's approach to managing actions (non-conformance, corrective or preventative actions), legal requirements and other commitments. Non-conformances can be identified either in an audit, management review, incident, site inspection or through a staff member within the field or office.

Reporting of non-conformances and opportunities for improvement are undertaken and records held in the WNR HSE Management spreadsheets as already outlined. Action may be taken immediately to rectify a non-conformance and/or a control determined and implemented to prevent recurrence of the same or a similar non-conformance.

10.3 Continual Improvement

Continual improvement is a cornerstone of the management system. The processes of applying and implementing the system requirements and ensuring continual improvement is functionally achieved through the various mechanisms described in Section 9 of this document.

Continual improvement is also fundamental to managing and adjusting compliance obligations to ensure that these obligations remain in-step with site risks and opportunities. This process is managed through regular and planned reviews of relevant compliance orientated documents.