

Workplace Health and Safety Policy

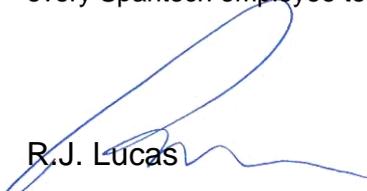
Spantech is committed to ensure the health and safety of all persons involved with or affected by the operations of the company.

Continual improvement in Health and Safety performance will be achieved by setting objectives, measuring progress and communicating results.

To deliver on our commitment, we will:

- provide a health and safety risk management system and procedures that are relevant to the nature and scale of work undertaken;
- set measurable targets and seek to continually improve our health and safety performance with the long-term aim of eliminating work-related injury and illness;
- comply with all applicable health and safety laws, regulations, statutory obligations and other applicable requirements;
- communicate Spantech's Health and Safety Policy and procedures to all employees and other interested parties as appropriate to ensure they are aware of their obligations with respect to Spantech's operations;
- ensure the accountability for Health and Safety matters is clearly assigned, defined and communicated and staff provided the resources to meet our objectives;
- consult with and achieve the personal commitment of all employees, subcontractors, suppliers and consultants to healthy and safe workplace practices;
- ensure our Health and Safety management adopts a preventative approach using comprehensive risk assessment; and
- periodically review and revise our Health and Safety Policy and procedures to maintain their relevance.

We will respond to the Health and Safety challenges in all areas of our business and it is the responsibility of every Spantech employee to implement this policy.



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CEO
Spantech Pty Ltd
20/2/2020

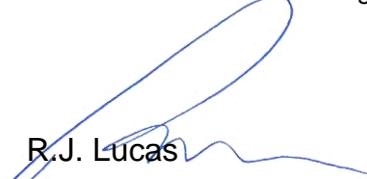
Quality Assurance Policy

Spantech is committed to ensure the high quality of our service and projects throughout the operations of the company.

To deliver on our commitment, we will:

- implement an effective Quality Management System commensurate with the size and capabilities of the company;
- comply with the requirements of AS/NZS ISO 9001 and any additional quality requirements of our clients;
- set quality objectives, measure progress and review results to ensure the continual improvement and effectiveness of our Quality Management System;
- ensure Spantech's Quality Assurance Policy and procedures are communicated to and understood by all employees;
- periodically review our Quality Assurance Policy and procedures to maintain their relevance.

It is the responsibility of every Spantech employee to implement this Policy to ensure our quality performance satisfies our contractual obligations and exceeds the expectations of all our Clients.



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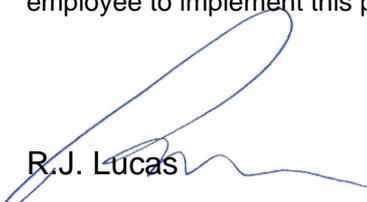
Environmental Policy

Spantech is committed to sustainable development throughout the operations of the company. Continual improvement in environmental performance will be achieved by setting objectives, measuring progress and communicating results.

To deliver sustainable development, we will:

- communicate Spantech's Environmental Policy and procedures to all relevant stakeholders including employees and others working on our behalf;
- comply with all applicable environmental laws, regulations, statutory obligations and relevant codes of practice;
- maintain environmental management systems that are appropriate to the nature and scale of our business;
- make business decisions that work towards achieving sustainable development;
- ensure that our employees, subcontractors, suppliers and consultants are aware of and have the necessary skills to fulfill their environmental obligations with respect to Spantech's operations;
- strive to conserve resources and eliminate adverse environmental effects and risks that may be associated with our services and operations;
- manage waste in order of preference: avoid waste; re-use; recycle; energy recovery; or correct disposal;
- work with our clients and other stakeholders to help them achieve their environmental objectives and obligations; and
- periodically review and revise our Environmental Policy and procedures to maintain their relevance.

We will respond to the environmental challenges in all areas of our business and it is the responsibility of every employee to implement this policy.



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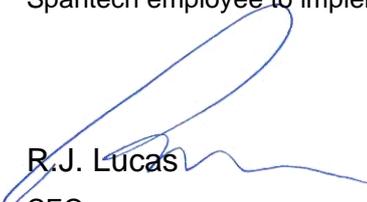
Rehabilitation Policy

Spantech is committed to the rehabilitation of employees entitled to compensation for work related injury or illness throughout the operations of the company. Continual improvement in rehabilitation procedures will be achieved by setting objectives, measuring progress and communicating results.

To deliver effective rehabilitation, we will:

- provide a safe and healthy work environment, but in the event of an injury or an illness, making sure a return to work (RTW) program is commenced as soon as possible and in accordance with medical advice;
- ensure alternate and meaningful duties are made available to the injured or ill employee, where practicable, to facilitate their safe and early return to work in accordance with relevant the Workers Compensation Legislation;
- respect the confidential nature of medical information and ensuring there will be both verbal and written confidentiality;
- ensure all employees are consulted in the development of their RTW plan for a structured and safe return to work that will not disadvantage them;
- ensure the injured employee has access to suitable treatment to assist in their recovery;
- comply with all applicable laws, regulations, statutory obligations and other applicable requirements;
- appoint a Rehabilitation Officer to facilitate rehabilitation and coordinate return to work matters;
- provide the resources to meet our rehabilitation objectives;
- set measurable targets and seek to continually improve our rehabilitation performance;
- periodically review and revise our Rehabilitation Policy and procedures to maintain their relevance.

We will respond to the rehabilitation challenges in all areas of our business and it is the responsibility of every Spantech employee to implement this policy.



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Equal Opportunity and Harassment Policy

Spantech is committed to a healthy and safe workplace free from discrimination and harassment.

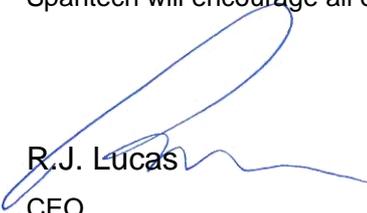
Spantech will provide every employee and potential employee with fair and equal access to employment opportunities, recruitment and employment processes and career development by taking positive steps to remove any existing or future barriers that discriminate on the basis of a person's gender, race, religion, disability, marital status, sexual orientation, age, parental status, union membership or political affiliation.

Spantech recognises workplace harassment and sexual harassment can have detrimental effect on workers, leading to psychological and physical illness and injury with negative effects on the performance and profitability of a company.

To deliver on our commitment, we will:

- communicate internally our obligation to provide equal opportunities in a manner that fosters understanding, acceptance, tolerance and support amongst all employees;
- inform workers of their right to a non-discriminatory workplace;
- strive to fully utilise and develop the potential of all employees;
- ensure all persons are trained and understand their responsibilities for workplace harassment prevention;
- have procedures and controls to prevent workplace harassment or minimise the risks;
- encourage any person who experiences workplace harassment to report it to their supervisor or management;
- ensure any allegations of workplace harassment will be treated seriously, and investigated promptly and impartially;
- provide assistance to workers to manage and resolve workplace harassment complaints consistent with Spantech's WHS complaint resolution guidelines;
- take disciplinary action against a person who harasses a worker, victimises someone who has made a complaint, or makes malicious frivolous or vexatious complaints;
- apply this policy to all employees, contractors and suppliers;
- comply with all relevant legislation;
- review this policy at regular intervals as required by management WHS review procedures.

Spantech will encourage all employees to take the necessary action to aid in meeting these aims.



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Drug and Alcohol Policy

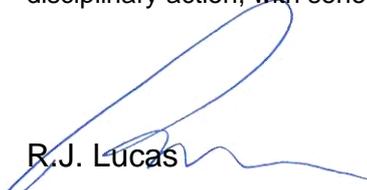
Spantech is committed to ensuring our employees and contractors at all Spantech workplaces are physically, emotionally and mentally fit to perform their duties unaffected by drugs or alcohol.

To deliver on our commitment, we will:

- ensure employees are provided drug and alcohol awareness training;
- ensure workers understand the consumption of alcohol is prohibited during work time, including rest and meal breaks, and is considered to be a serious breach;
- ensure workers understand the use, sale or personal possession of illegal drugs at a Spantech workplace is considered to be a serious breach and may result in criminal prosecution;
- encourage workers to report the use of prescription or pharmaceutical (over-the-counter) drugs to management when it is known by the worker that their use may affect their ability to perform assigned duties. Management shall ensure the privacy of the worker is respected;
- ensure employees and other workers do not commence or continue work unless they are fit for work, unaffected by drugs or alcohol. On-site drug and alcohol screening shall be conducted in accordance with relevant Australian Standards and company procedures to verify if an employee is fit for work;
- provide employees who may have drug or alcohol issues, access to an employee assistance program, where appropriate;
- ensure that if a management approved function is held at a Spantech workplace it will be outside working hours and the quantity of alcohol provided will be limited. Low and non-alcoholic beverages will also be available, and all persons are required to adopt a responsible attitude to alcohol consumption. Once having attended the function, no one is to return to any part of the workplace. All attending are to ensure that they are well below the legal limit for driving, and if there is a possibility of being over the legal limit, alternate transport arrangements are to be made.

Spantech considers alcoholism and other drug addictions to be treatable illnesses.

This policy applies to all Spantech employees, contractors and visitors. Breaches of this policy will lead to disciplinary action, with serious or repeated breaches by Spantech employees being dismissible offences.



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20/2/2020

Industrial Relations Policy

Spantech is committed to the effective, fair and ethical management of workplace issues, centred on consultative, collaborative and cooperative measures involving, but not limited to, the participation of Employees, Unions, Subcontractors and Consultants.

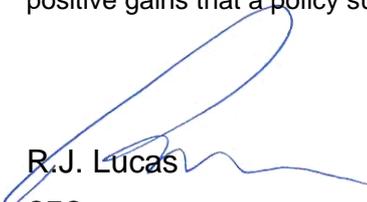
These measures are directed at:

- creating an environment of improved workplace management culture;
- improving industrial/employee relations;
- generating employee commitment; and
- achieving respect for and the observance of individual and collective rights.

Spantech's objectives are to:

- adopt a strategic approach to managing industrial and employee relations at enterprise level;
- create employee relations practices that go beyond compliance but become part of Spantech's day to day operations;
- return to stakeholders improved employee and industrial relations measured through the reduction of time lost in the resolution of conflict and grievances; and
- create a workplace environment that empowers employees and actively encourages their participation.

To achieve these objectives Spantech will ensure sufficient resources are made available to make possible the positive gains that a policy such as this can bring to both Spantech and all those associated with the Company.



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20/2/2020

IT, Internet, Email & Social Media Policy

Spantech is committed to the professional, moral and ethical use of Information Technology (IT), Internet, Email and Social Media.

This policy applies to all employees and their use of company owned hardware, BYO hardware and any IT device used by the employee during work hours. It includes but is not limited to local, server or cloud software, company websites and company social media accounts.

Internet Use

The internet provided by Spantech is for business use. Limited private use is permitted if the private use does not interfere with an employees' work and that inappropriate or illegal sites are not accessed e.g. pornographic, gambling or sites containing illegal content.

Management has the right to monitor and determine if private use is excessive or inappropriate. Excessive or inappropriate personal use may lead to disciplinary action including dismissal. Illegal internet conduct may lead to criminal prosecution.

Email Use

Spantech employees acknowledge that:

- email facilities are provided for formal business correspondence;
- they will take care to maintain the confidentiality of sensitive information. if emails need to be preserved, they should be backed up and stored offsite;
- limited private use of email is allowed if it does not interfere with or distract from an employee's work.
- management has the right to monitor an employee's monitor and determine if an employees' private use is excessive or inappropriate;
- non-essential email, including personal messages, should be deleted regularly from the 'Sent Items', 'Inbox' and 'Deleted Items' folders to avoid congestion; and
- all emails sent must include the approved business disclaimer.

Professional Use of Social Media

Spantech requires employees to maintain a high standard of behaviour when using Social Media for work or personal purposes.

Spantech employees acknowledge they must not:

- represent their views as being the views of the company;
- bring Spantech or their clients into disrepute or divulge commercially sensitive information; or
- establish a social media account or profile in the company name without the prior approval of the CEO or Marketing Manager.

Deliberate contravention of this policy will construe a breach of the Code of Conduct policy and will subject performance management processes which may include termination of employment.

IT Security

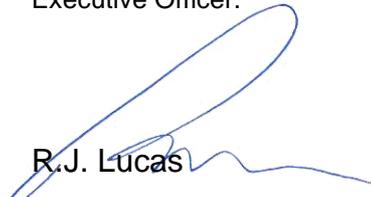
Spantech aims to maintain a secure IT system, internet, email and social media assets for the protection of the company, our employees, contractor and clients.

We will achieve this by:

- maintaining a secure network with current software;
- requiring our employees to:
 - maintain strong passwords and keep passwords and other access information secure; and
 - report any actual or suspected security issues to management immediately; and
- reporting the loss of any private information to regulators in accordance with legislative requirements.

This policy applies to all employees and contractors of Spantech.

This policy will be regularly reviewed by Spantech and any necessary changes will be implemented by the Chief Executive Officer.



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Intellectual Property, Confidential Information and Security Policy

Spantech is committed to ensuring the security of its intellectual property, confidential information as well as Spantech's clients, business partners and Defence confidential information and other media.

All intellectual property developed by employees during their employment with Spantech, including discoveries, processes or inventions made in the performance of their duties related in any way to the business of Spantech, will remain the property of Spantech.

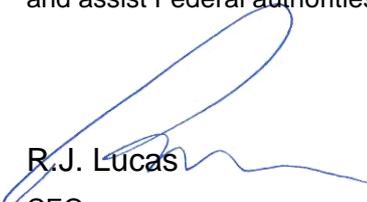
Employees may be given access to confidential information, data, business property, keys to premises, confidential Defence information or any other business-related property/information in the performance of their duties. This must be protected and used only in the interests of Spantech.

Without Spantech's written consent, employees must not during or after their employment, other than as required by law:

- disclose or use any part of any confidential information outside of the performance of their duties and in the interests of Spantech;
- authorise or be involved in the improper use or disclosure of confidential information; or
- disclose or allow any unauthorised use, access, modification or release of any confidential Defence documentation, materials or plans.

'Confidential information' includes any information in any form relating to Spantech and related bodies, clients or businesses, which is not in the public domain. The definitions of 'Defence confidential information' is detailed in the Spantech Defence Project Security Guideline. Employees must act in good faith towards Spantech and must prevent (or if impractical, report) the unauthorised disclosure of any confidential information.

Failure to comply with this policy will result in performance improvement processes including dismissal, and Spantech may also pursue monetary damages or other remedies. If there is a failure to comply with Defence project security guidelines, Spantech will commence performance improvement processes including dismissal and assist Federal authorities in any enquiries, investigations and prosecutions.



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Performance Management & Improvement Policy

Spantech strives to provide an environment where all employees understand the impact their contributions have on the achievement of Spantech goals and are provided the opportunity for ongoing personal growth.

We can accomplish this goal through a strong performance-based management program that culminates in an annual performance review. The performance management process is continuous as we plan, manage, review, and reward performance.

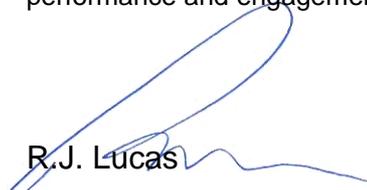
Performance Management

Spantech management will comply with the relevant requirement of the EBA and Employment Agreements. All performance management aspects will be documented to ensure procedural requirements have been followed.

Performance Improvement

Spantech management will comply with the relevant requirement of the EBA and Employment Agreements. Where there are disciplinary or performance issues, performance improvement processes will be utilised. All performance improvement processes will be documented to ensure procedural requirements have been followed.

We are committed to supporting staff and fostering a positive environment that is conducive to elevated levels of performance and engagement.



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Grievance & Issue Resolution Policy

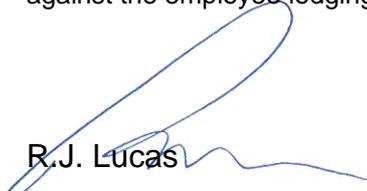
Spantech is committed to the right of every employee to raise a grievance with their manager if they believe a decision, behaviour or action affecting their employment is unfair. Every employee is also actively encouraged to raise an issue if they believe it is unsafe and/or can adversely affect Spantech operations.

An employee may also raise a grievance about any performance improvement action taken against them.

We aim to resolve issues and grievances promptly and as close to the source as possible. When necessary, Spantech will escalate a grievance or issue to the next higher level of management for more discussion and resolution, and continue escalating it to the level above until it is resolved.

Managers will do their utmost to action grievances or issues objectively, discreetly and promptly.

Grievances that are misconceived, vexatious, and lacking substance may result in disciplinary action being taken against the employee lodging the grievance.



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Recruitment, Training & Development Policy

Spantech is committed to a robust and professional approach to recruitment and selection helps us to attract and appoint individuals with the necessary skills and attributes to fulfil our aims and support our business goals.

All appointments should be made on the Principle of Merit, compliance with all relevant Federal & State Legislation and adherence to this policy and related processes.

Our business recruits people via the following methods:

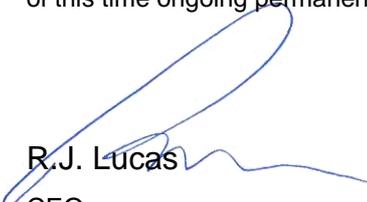
- Internal
- External
- Employee Referred

Spantech is committed to providing employees with adequate training and ongoing development to do their job safely and competently.

Our business believes training is a two-way process. We encourage employees to participate and to highlight any gaps in their own skills or knowledge they believe they have to allow Spantech to assist in further developing their skills and knowledge relevant to the business and the employee.

Training and Development includes internal on-the-job training, revising and understanding written instructions such as standard operating procedures & SWMS, coaching & mentoring, external training and courses; with safety, health, environmental and quality training as a high priority.

Spantech provides a probationary period for both the employee and the business to assess suitability, fit and competency within a role. During this period the Spantech commits to reviewing employee performance and at the end of this time ongoing permanent employment will be confirmed.



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Leave & Flexible Work Arrangements Policy

Spantech is committed to equitable and reasonable provision of Leave and Flexible Working Arrangements.

General Leave policy

Unless specified otherwise, employees referred to in this policy mean permanent full-time or part-time employees of Spantech.

All employees are entitled to leave in accordance with the Spantech EBA or Employment Agreements and statutory provisions. Where the entitlements or practices in the Spantech EBA or Employment Agreements result in a conflict, the applicable award, employment contract or employment law takes precedence.

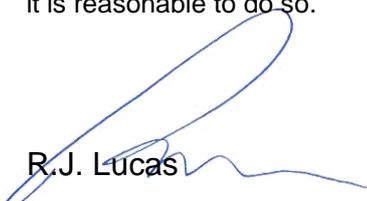
All planned leave has to be mutually agreed, and take into account workloads, Spantech and employee's needs. Leave must be approved in advance, except when the employee can't anticipate the absence. Any documents regarding leave will be kept on the employee's personnel file.

Spantech will not be responsible for costs incurred if employees pre-book holidays and their leave applications are subsequently rejected or modified, based on project commitments and workloads.

Flexible Working Arrangements

Employees may request flexible working arrangements based on parental and carer responsibilities. Employees must place the request in writing.

To comply with the Equal Opportunity Act, Spantech will consider this request, and consider all relevant facts and circumstances in deciding whether or not to agree to the request. Such a request will not be refused unless it is reasonable to do so.



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Conflict of Interest Policy

Spantech is committed to the addressing Conflict of Interest in a positive, professional manner.

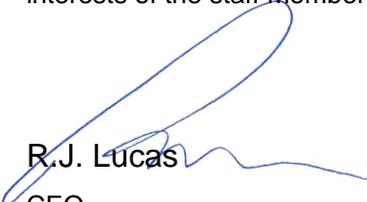
Spantech acknowledges Conflict of interest arises whenever the personal, professional or business interests of an employee are potentially at odds with the best interests of Spantech.

All employees are required to act in good faith towards Spantech. Employees need to be aware of the potential for a conflict of interest to arise and should always act in the best interests of Spantech.

As individuals, employees may have private interests that from time to time conflict, or appear to conflict, with their employment with Spantech. Employees should aim to avoid being put in a situation where there may be a conflict between the interests of Spantech and their own personal or professional interests, or those of relatives or friends.

It is impossible to define all potential areas of conflict of interest. If an employee is in doubt if a conflict exists, they should raise the matter with their manager.

Where such a conflict occurs (or is perceived to occur), the interests of Spantech will be balanced against the interests of the staff member and, unless exceptional circumstances exist, resolved in favour of Spantech.



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20/2/2020

Code of Conduct Policy

Spantech is committed in the belief of responsible social and ethical behaviour from all employees. This policy clarifies the standards of behaviour that Spantech expects of all employees. Furthermore, our employees have an obligation to the Business, our Clients and themselves to observe high standards of integrity and fair dealing. Unlawful and unethical business practices that undermine employee and Client trust and will never be condoned by Spantech.

Our Code of Conduct Policy applies to all employees and provides the framework of principles for conducting business, dealing with other employees, Clients and suppliers. The Code of Conduct does not replace legislation and if any part of it is in conflict, then legislation takes precedence.

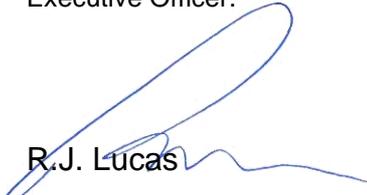
Spantech expects co-operation from all employees in conducting themselves in a professional, ethical and socially acceptable manner of the highest standards.

Under this policy Spantech Employees will:

- Act and maintain a high standard of integrity and professionalism;
- Be responsible and scrupulous in the proper use of Company information, funds and property;
- Be considerate and respectful of the environment and others;
- Exercise fairness, equality, courtesy, consideration and sensitivity in dealing with other employees, clients, contractors, suppliers and others;
- Avoid apparent conflict of interests, promptly disclosing to a Spantech senior manager, any interest which may constitute a conflict of interest;
- Promote the interests of Spantech;
- Perform duties with skill, honesty, care and diligence;
- Abide by policies, procedures and lawful directions that relate to their employment with Spantech and/or our Clients;
- Avoid the perception that any business transaction may be influenced by offering or accepting gifts;
- Under no circumstances offer or accept money except as per contractual requirements;
- Comply with the Spantech company and site-specific rules;
- Not be disadvantaged or prejudiced when they act in good faith and follow correct reporting procedures to raise a complaint or disclose an alleged breach of the Code. All reports will be dealt with in a timely and confidential manner.

Any employee in breach of this policy may be subject to disciplinary action, including termination. Should an employee have doubts about any aspect of the Code of Conduct, they must seek clarification from Manager.

This policy will be regularly reviewed by Spantech and any necessary changes will be implemented by the Chief Executive Officer.



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UV and Heat Protection Policy

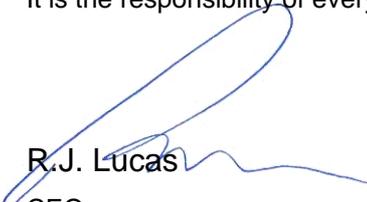
Spantech is committed to ensure the health and safety of all persons involved with or affected by the operations of the company.

This policy aims to eliminate, and where not practicable, reduce worker exposure to ultraviolet radiation, or 'solar UVR', and heat stress by implementing appropriate control measures.

To deliver on our commitment, we will:

- implement sun protection control measures for outdoor workers when the SunSmart Alert UV Index is 3 and above, and at all times when working in alpine regions or near highly reflective surfaces;
- provide shaded areas or temporary shade where possible and move tasks into shade where possible;
- provide shaded areas for rest and meal breaks;
- provide cool drinking water at construction sites;
- when possible, schedule outdoor work to occur when levels of solar UVR are less intense;
- rotate workers to avoid exposing any one individual to UVR for long periods of time;
- tint windows of work vehicles and modify reflective surfaces where possible;
- identify and eliminate or minimise contact with photosensitising substances;
- provide information to workers to enable them to work safely in the sun and effectively examine their own skin;
- provide and require the use of appropriate sun protective PPE including sun protective work clothing (long-sleeved shirts and long pants), sun protective hats, sunglasses and sunscreen, unless the PPE creates a secondary hazard to the worker;
- periodically review and revise this policy and related procedures to maintain their relevance.

It is the responsibility of every Spantech employee to implement this policy.



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