

HEALTH, SAFETY, SECURITY & ENVIRONMENT POLICY

Coffey policies and procedures do not form part of employees' employment agreements. Coffey may vary or rescind any policies and/or procedures from time to time, in its absolute discretion. Not complying with Coffey policies and/or procedures can lead to disciplinary action.



This policy applies throughout Coffey [i.e. Coffey International Limited and all of its related entities worldwide], subject to the laws and regulations applicable in each country. Any reference made in this document to "staff" or "staff member/s" includes employee/s, consultant/s and/or contractor/s of Coffey.

Coffey's HSSE Policy describes our commitment to and the leadership accountabilities necessary to protect the safety, security, health and wellbeing of our staff and the environment, wherever we operate globally.

1. OUR POLICY

Coffey is committed to protecting the health, safety and security of our people, our contractors and the environment, in all the places in which we work around the globe, by putting Health, Safety & Security first, above all else, and by establishing and fostering an environmentally aware culture

2. OUR COMMITMENT IS TO:

- **Strive** to operate injury and incident free.
- **Be compliant with** applicable Occupational Health & Safety laws, Security laws, Environmental laws, regulation and statutory obligations in each of the jurisdictions in which we work.
- **Assign** health, safety, security and environment accountabilities and responsibility's for all Coffey people, and to drive individual performance and behaviour through regular review.
- **Train** our people and contractors to be competent to safely undertake their work activities.
- **Identify, assess and manage** hazards and risks before commencing and during any work or operational activity including, where applicable, consideration of safety in design principles.
- **Intervene immediately** (stop work where required) and report any work practices, hazards, equipment or conditions that threaten the health, safety or security of any person or the environment.
- **Maintain** healthy, safe and secure working conditions, and ensure that our places of work, vehicles, tools, plant and equipment are safe and fit for purpose.
- **Maintain** a documented Health, Safety, Security and Environment Management System and ensure performance and compliance is assured through regular monitoring, auditing, reporting and review for continuous improvement.
- **Communicate and consult** on health, safety, security and environment initiatives and issues.
- **Incorporate** health safety and security of our people and care for the environment as an integral part of the business strategy, planning and decision-making at all levels.
- **Proactively manage** our waste streams by prompting waste elimination, material recycling, improving energy efficiency and maximising the use of low impact materials.

3. OUR LEADERS SHALL:

- **Be accountable** for health, safety, security and environment compliance within their area of authority.
- **Lead** by example by demonstrating and supporting positive behavioural commitment from our people to be healthy, safe, secure and environmentally conscious.
- **Consult**, seek contributions and communicate regularly with our people on matters affecting health, safety, security and the environment.
- **Objectively** investigate all reported incidents and implement corrective actions in a timely manner, and not tolerate incidents involving wilful negligence, criminal intent or use of illicit substances.

4. OVERSIGHT AND COMPLIANCE

Oversight and Governance for Coffey Health, Safety, Security and Environment is the responsibility of the Board of Coffey International Limited. The Board shall regularly review this Policy for continuing suitability.

The Group Executive is accountable for the implementation of the Coffey Health, Safety, Security and Environment Management System and the reporting of its effectiveness.

Compliance with and performance against this Policy is the responsibility of all Coffey staff.

5. RELATED DOCUMENTS

This policy should be read in conjunction with Coffey's:

- Protected Disclosure Policy
- Dispute Resolution Guidelines
- Disciplinary Policy
- [HSSE Procedures](#)

These can be accessed from Coffey's intranet homepage under [Policies, Procedures & Guidelines](#)

APPENDIX

Document control information

Document status

The current status of this document is shown below.

Title	HSSE Policy
Version	6.0
Effective date	4 July 2012
Publisher	Group HSSE Manager
Content Owner	HSSE Governance Adviser
Authorised by	Managing Director

Document history

The history of changes made to this document is shown below.

Version	Date published	Author	Description
4.0	March 2011	Group HSSE Manager	Reissue to reflect change in Managing Director
5.0	June 2012	Group HSSE Manager	Review and reissue of HSSE Policy
6.0	July 2012	Group HSSE Manager	Redraft to reflect amendments required by Coffey Board



COFFEY INTERNATIONAL LIMITED (UK)

EQUAL EMPLOYMENT OPPORTUNITY POLICY

Coffey is committed to Equal Employment Opportunity (EEO) and ensuring that all staff receive fair and equitable treatment with respect to their employment with the company. We positively value the many contributions that a culturally diverse workforce such as ours brings to the business. We shall, at all times, strive to work within UK legislation and regulations, including the Equality Act 2010, as well as promoting best practice.

The Equality Act 2010 prohibits discrimination and/or harassment on the grounds of the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. We view any form of discrimination, harassment and bullying as serious and unacceptable conduct and the consequences of breaching this policy may result in disciplinary action, up to and including dismissal.

To achieve this commitment, we recognise that it is the responsibility of all management and staff to ensure that the workplace is free of discriminatory practices and therefore:

All employees are encouraged to treat their fellow employees with fairness and equality so that our total working environment is free from discriminatory practices.

All employees will be provided with information on the principles of EEO, discrimination, harassment, bullying and the internal procedure for the resolution of complaints.

Complaints will be investigated impartially in a confidential and prompt manner.

All employees are to be treated equitably and the person who best meets the requirements of an available position will be selected on their relevant merit.

Employees will be encouraged to develop their potential through training, further education and job experience based on identified needs of the business. Participation in training and development programs shall be based on identified needs arising from assessment of work performance, ability, development potential and individual career goals and aspirations.

Conditions of service and benefits will be available to all workers who should have access to them as per local legislative requirements. We will monitor redundancy criteria and procedures to ensure that they are fair and objective, comply with local legislative requirements and do not directly or indirectly discriminate against employees.

Disciplinary procedures will be carried out fairly and uniformly for all workers, whether they result in the giving of disciplinary warnings, dismissal or other disciplinary action.

We will monitor our use of fixed-term employees to ensure that they are being offered appropriate access to benefits as per local legislative requirements. We will also monitor the conditions of service of part-time employees to ensure that they are being offered appropriate access to benefits as per local legislative requirements, in addition to appropriate training and promotion opportunities.

All requests to alter working hours will be dealt with appropriately under our flexible working policy and as per local legislative requirements.

If an employee is disabled, or becomes disabled in the course of their employment with the Company, we will aim to support the employee as much as possible. We will also monitor the Coffey UK EEO

Policy physical features of our premises to consider whether they place disabled workers, job applicants or service users at a substantial disadvantage compared to other workers. Where possible and proportionate, we will take steps to improve access for disabled workers and service users.

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

John Douglas
Managing Director
4 July 2011

Updated: 4 July 2011

Diversity and equal opportunity policy

1. Introduction

The Board of Coffey International Limited ("Coffey" or "the Company") is committed to an inclusive workplace that embraces and promotes diversity and equal opportunity.

We value, respect and leverage the unique contributions of people with diverse backgrounds, experiences and perspectives to enhance understanding of the needs of our customers and provide innovative solutions and exceptional customer service to an equally diverse community.

We reward and promote our people based on assessment of individual performance, capability and potential. We are committed to providing opportunities that allow individuals to reach their full potential irrespective of individual background or difference.

We recognise that our employees will assume changing domestic responsibilities throughout their careers.

2. Purpose

The Diversity and Equal Opportunity Policy ("Policy") aims to create a workforce that is fair and inclusive and seeks to retain and attract the best people to do the job.

Through Coffey's Vision, Promise and Behaviours, Coffey recognises its talented workforce as a competitive advantage.

Coffey believes in treating people with respect and dignity as an individual and as a part of this, Coffey does not tolerate unlawful acts of discrimination. Coffey recognises workforce diversity as an organisational strength, understanding that drawing on a wide variety of capabilities, ideas and insights enhances decision making quality and entrepreneurship.

The guiding principles of workforce diversity within Coffey have been in place at a service line level; however recent work has commenced to align these principles globally and to more clearly communicate our organisation's belief in workforce diversity.

3. Principles

The guiding principles, which promote awareness and proactive management practices regarding workforce diversity, are applied across the Coffey Group. These are:

- A diverse workforce is a competitive advantage in retaining and attracting the best people to improve our business performance
- A skilled workforce that reflects the diversity of our customers and communities, within each country in which we operate, is able to increasingly understand and meet their needs with innovative solutions and effective service delivery
- The experience of work for employees is to be inclusive and respectful of individual differences, including but not limited to, family responsibilities
- Awareness of the rights and responsibilities of individuals with regard to equity and respect for others is important for all employees

- We promote a work environment that values seeking and utilising the contributions of employees with diverse views and experiences
- We value practices that provide access to development and promotional opportunities, with final decisions based on merit and against objective criteria

Local diversity practices and reporting vary in each of the markets in which Coffey operates, in accordance with the local legislation, business operations and culture.

4. Policy application

- Diversity in the context of Coffey encompasses differences in ethnic and cultural backgrounds, gender, age, sexual orientation, religion and disability.
- This Policy applies to all employees of Coffey globally, to the extent that this Policy does not conflict with Equal Employment Opportunity (“EEO”) and anti-discrimination legislation as it exists in each market in which Coffey operates.
- The principles of EEO and the relevant legislation in each of our regions is an important foundation for this Policy. The principles of EEO are outlined in specific EEO and related policies for each Coffey region.
- This Policy provides guidance for all people practices across Coffey, including but not limited to those programs and initiatives specifically aimed at recognising and promoting workforce diversity.
- This Policy does not replace or limit regulatory requirements.

5. Responsibility

Responsibility for diversity has been incorporated into the Board Charter, Nomination Committee Charter (Board diversity) and Human Resources and Remuneration Committee Charter (diversity at all levels of the organisation below Board level).

Monitoring of progress and reporting to the Human Resources and Remuneration Committee is co-led by the Managing Director and Group Executive Human Resources supported by the Executive Management Team.

The Executive Management Team sets and monitors progress against specific objectives, in line with this Policy which maximise workforce capability and returns for shareholders. The Executive Management Team provide over-arching governance and guidance and ensures workforce diversity retains a focus as a strategic workforce opportunity. The consistent monitoring and evaluation of diversity initiatives enables the Executive Management Team to remain proactive in its management of workforce diversity and ensure that diversity related programs of work are progressing correctly and successfully.

Individual leaders across the Coffey Group are responsible for acting in alignment and upholding the principles and philosophy of this Policy.

6. Governance

To assist Coffey in seeking sound and practical corporate governance, the Council will give due regard to:

- relevant provisions of the ASX Corporate Governance Council’s Principles and Recommendations;
- local EEO and anti-discrimination legislation as it exists in each market in which Coffey operates; and

- commitments made to the Equal Opportunity for Women Agency (EOWA) as part of the statutory reporting requirements for Australian based employees.

7. Gender diversity

The Coffey Board aims to achieve specific objectives regarding gender diversity. This is to the extent that these objectives do not conflict with affirmative action requirements as they exist in each market in which Coffey operates.

The Coffey Board has established the following diversity-related measurable objectives for the Group:

- to increase the percentage of women at all levels in the company, including management and executive levels; and
- having achieved a 28.6% proportion of women on the Board, to maintain a significant participation by women at Board level.

Assessment of these objectives and review of progress will be carried out on an annual basis by the Human Resources and Remuneration Committee, who will report its assessment to the Board of Directors and make recommendations as appropriate. Progress against targets will be included in the Company's annual reports.

8. Review of this policy

The Nomination Committee will review this Policy at least annually, and make recommendations to the Coffey Board as to any changes it considers should be made.

9. Access to this policy

This Policy will be available for viewing on the Coffey website.

10. Document status

The current status of this document is shown below.

Title	Version	Effective date	Publisher	Content owner	Authorised by
Diversity and equal opportunity policy (Governance policies)	2	28/06/2012	Company Secretary	Company Secretary	Board

11. Document history

The history of changes made to this document is shown below.

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2	28/06/2012	Company Secretary	2nd version of Diversity and equal opportunity policy