InfraBuild OHS Response as Supplier

TOOL

General instructions

This this document has been developed by InfraBuild as a standard for response to Credit 3.3 Procurement OH&S Assessment from participants of the SSA Certification Program.

Definitions

Term	Definition
Biological Hazards	Any organic substance that presents a threat to the health of people or other living organisms. Biological hazards can include viruses, biological toxins, fungi, or bio-active substances etc.
Chemical Hazards	Any non-biological substance that can cause harm to life or health. Chemical hazards can be solid, liquid, or gas, and can cause harm to anyone directly exposed, usually through inhalation, ingestion, or direct contact to the skin
Health Hazards	A health hazard is a biological, chemical, or physical factor that can have either short or long-term negative impacts on human health. This could include contaminated drinking water, exposure to toxic or carcinogenic toxins, exposure to dust or mould, exposure to viruses or contagious diseases etc.
Physical Hazards	A hazard that can cause physical harm with contact. This could include working in conditions that are too hot or too cold, vibration and noise hazards, working with explosive or flammable materials, trip hazards etc.
Psychosocial Hazards	Psychosocial hazards are aspects of work which have the potential to cause psychological or physical harm.
WRIB	We Are InfraBuild

References

InfraBuild Workplace Health and Safety Policy (PO-77-824), provided on next page

InfraBuild 2022 Sustainability Report (pages 28-35) and InfraBuild 2021 Sustainability Report (pages 21 – 23)

For explanation of WRIB Safe Way and InfraBuild Safety Pillars, Safety Principles and Life Savers

InfraBuild 2022 Sustainability Report

InfraBuild 2021 Sustainability Report

InfraBuild
Building futures through sustainable steel

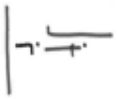
Workplace Health and Safety Policy

InfraBuild's goal is to achieving world class performance in work health, safety and wellbeing through a commitment to promoting wellbeing and preventing ill health and injuries related to physical, chemical and psychosocial risk esxpsoures in the workplace.

This policy applies to anyone employed or engaged by an InfraBuild company and subsidiaries, including employees (whether permanent, fixed-term or temporary), contractors, secondees, agents and directors "you".

Consistent with this we will:

- Manage policy implementation, facilitate stakeholder understanding and be committed to continued policy maintenance and improvement.
- Establish and monitor measurable objectives and targets to continually improve health and safety performance. This will take into account evolving community expectations, management practices, scientific knowledge, technology, and business structure.
- Demonstrate due diligence and apply adequate standards that reflect the Company's commitment to workplace health and safety. Demonstrate compliance with applicable health and safety laws, regulations, standards and other relevant requirements.
- Manage risk by implementing systems to identify hazards, assess, control and monitor risk measures, and implement the appropriate mitigating actions, taking into account the variable nature of workplace activities and related health and safety risks.
- Consult with and involve workers in the management of workplace health and safety. This includes the setting of objectives and targets, the development of policies, procedures and systems, and the decision making process regarding the management of risks in the workplace.
- Inform workers and visitors to InfraBuild managed sites of their obligations regarding this policy. Communicate openly on health and safety matters and disseminate health and safety information to workers and visitors.
- Educate and train managers and workers, to enable them to work safely.
- Assign responsibilities and authorities to individuals, and hold them accountable.
- Monitor and review health and safety management system performance and trends. This includes regularly auditing work health and safety management systems to assess effective implementation and maintenance of this policy and demonstrating commitment to identifying and responding continuouis improvement opportunities.
- Support relevant work health and safety research and initiatives.



Francisco Irazusta

CEO and Executive Director

InfraBuild's Response

OHS Certification

Infrabuild entities are self-insured in the jurisdictions they operate. The InfraBuild safety management system is modelled on ISO45001 and is compliant to the requirements of Self-Insurance and checked by the National Audit Tool (Version 3). As self-insured entities InfraBuild businesses hold the relevant certificates of currency required for Self-insurance in each jurisdiction and are subject to external independent auditing by the regulators. Infrabuild is currently not certified ISO 45001.

Certificates of currency are available on request.

Overview of InfraBuild's OH&S Management System approach

InfraBuild is an Australian steel business with an international footprint. We are Australia's only fully vertically integrated steel manufacturer spanning scrap metal recycling, steel manufacturing and downstream distribution.

All our safety actions and behaviours are governed by our 'Be WRIB Safe' strategy and by working together as a team, with respect for one another, we build a safety culture of care, where we look out for our work mates and know that our work mates are looking out for us, that is the **WRIB Safe Way**!

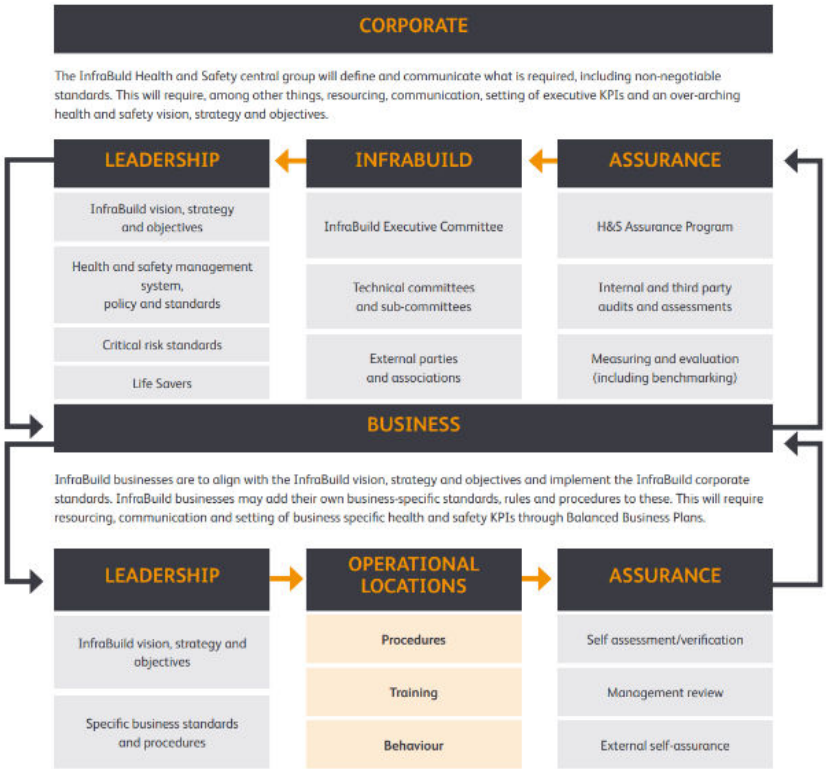
The **WRIB Safe Way** outlines how we manage health and safety. It's designed to be a roadmap for leaders through our InfraBuild safety strategy as we strive for world-class safety excellence. The **WRIB Safe Way** is underpinned by the WRIB Safe vision.

Our vision

We want our people and all members of the InfraBuild family to be safe, always. Every employee should be able to return home fit and well at the end of each workday. We believe that one injury is one too many.

Health and Safety Framework

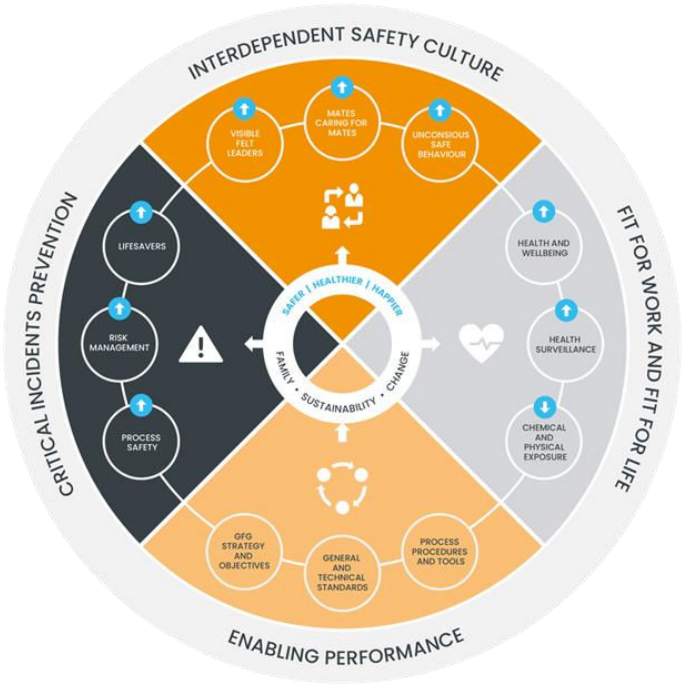
The InfraBuild health and safety framework supports the implementation of the vision, strategy, and objectives on the journey to world-class safety performance.



Strategy and plans

The InfraBuild health and safety framework supports the implementation of the vision, strategy, and objectives on the journey to world-class safety performance.

InfraBuild has four strategic pillars to achieve world-class safety outcomes; Enabling Performance, Critical Incident Prevention, Interdependent Safety Culture and Fit for work & Fit for Life



EHS Management software

Cority is the world class EHS Management platform used for reporting, tracking and management of incidents and hazards across Infrabuild. Cority is also used for management of change and the assurance and inspection programs for InfraBuild.

Identification and management of risks to InfraBuild's personnel

InfraBuild has specific processes to identify and manage risks. The objective of the risk management processes are to:

- Ensure the safety and welfare of our people, third parties, communities in which we work and the general public and manage adverse impacts on the environment.
- Manage risks and their operational, financial, reputational, or other impacts InfraBuild is exposed to.
- Ensure compliance with legal, regulatory, and other requirements.
- Improve planning, governance and decision making.
- Ensure a consistent approach to risk management across InfraBuild

Sites follow a documented risk management program and implement the requirements of the program.

Sites must have a risk register relevant to the risks on the site that is reviewed annually, or sooner if there is a related incident. Risks must be assessed by evaluating the likelihood and consequence and corresponding control measures. Control measures must be assigned to a relevant person

The table below details identified physical, chemical, and biological risks to personnel, and summarises the risk management practices that are in place to control each risk to an acceptable level:

Summary table of risks and how they are managed

Type of Risk	Risk Identification	How the risk is managed
Biological	Biological Hazard	Health surveillance requirements and exposure standards Safe work instruction Personal protective equipment
Physical	Electrical Hazard	Compliance to technical standard requirements Electrical Licencing Permit to work – High Voltage Access Permits
Chemical	Chemical Hazard	Hazardous Substance Procedure Safety Data Sheets Safe Work Instructions Personal protective equipment
Physical	Heavy Vehicle Operations – Chain of Responsibility (Transport Safety - Road)	Compliance to technical standard requirements Critical risk Management – road transport Road transport safety management system Chain of Responsibility compliance • Speed and fatigue management • Mass and dimension • Vehicle compliance and operating standards Load Restraint requirements (load restraint guidelines)
Physical	Hot Work	Permit to work with specific Hot Work Assessment Safe work instructions Personal protective equipment
Physical	Lifting Operations (Crane) (& Suspended loads)	Compliance to technical standard requirements Critical risk Management for lifting operations, crane integrity and safe access Safe work instructions Exclusion zones Crane integrity and safe access.
Physical	Mobile Equipment Operations (& Pedestrian safety)	Compliance to technical standard requirements Critical risk Management – mobile equipment and pedestrian safety Traffic management plans Vehicle pedestrian separation and exclusion zones Interaction protocols
Physical	Hazardous Manual Task	Hazardous manual task risk assessment Manual handling aids Materials handling equipment Safe work instructions
Physical	Molten Material Steelmaking Galvanising processes	Compliance to technical standard requirements Critical risk Management – Molten metal Process control Access control to molten metal production areas Personal protective equipment – molten metal

Physical	Machine Safety – including: • Operations and Maintenance of plant and equipment • Moving Product (product as it moves through the manufacturing process	Compliance to technical standard requirements Critical risk Management – Lockout, Tagout Verification (Isolation) standard and procedures Isolation – Personal protection Machine Guarding Standards AS/NZS 4024 Safe work instructions
Physical	Materials Handling and Storage	Safe work instruction Material handling equipment Engineered storage solutions Racking and storage
Physical	Noise (& vibration)	Hearing conservation standard Exposure assessment Safe work instructions Personal protective equipment
Psychosocial	Psychosocial Hazards	Policy and procedures Training and awareness Intervention protocols including by-stander awareness Reportable conduct process Employee assistance program
Physical	Slips Trips Fall	Safe work instruction Fall prevention and protection systems Housekeeping standards Pedestrian access controls including designated walkways and work areas
Physical	Train and Rail Operations (Transport Safety - Rail)	Compliance to GFG technical standard requirements Critical risk Management – train and rail safety Access control to rail corridor, control of level crossings (pedestrian and vehicle) Train and Rail safety management system Interface agreements Rail safety worker competency including medical compliance
Physical	Work at Height (& falling objects)	Compliance to GFG technical standard requirements Critical risk Management – working at height Permit to work including working at heights assessment Fall protection systems

Additional information:

InfraBuild is involved in the production, manufacturing and distribution phase of our products.

InfraBuild generally has minimal involvement at the in-use, demolition and end-of-life phases of our products, except as a recycler of ferrous metals through the InfraBuild Recycling business.

Supporting risk control processes

Consultation and Communication – Sites have documented arrangements for consultation and communication of health and safety information and matters. Sites conduct meetings to talk about safety, such as pre-start meetings, safety meetings and/or toolbox talks

Change Management - Sites follow management of change process for temporary and permanent changes in the workplace. The process describes the types of changes that require the process to be followed, assign roles, responsibilities and competencies for change management and detail how to initiate, assess, approve, implement, and check the effectiveness of changes in the workplace.

Contractor management - Sites follow a contractor management process. The process includes roles and responsibilities, contractor pre-qualification, scope and site conditions, risk management, health and safety planning, employee skills and competencies, safety targets and KPIs, audits and inspections and plant/equipment/material considerations.

Training and Competency - Sites have a documented training program identifying health and safety training and competency requirements. Records of health and safety training and competency assessments are maintained. Sites make sure that workers are trained and assessed in accordance with training, verification of competency and refresher training requirements.

Emergency Response - All sites have an emergency response plan that considers, and risk assesses potential emergency scenarios. The plan includes preparation, response, and recovery phases, as well as incident/emergency/crisis escalation criteria. Emergency roles and responsibilities are outlined in the plan.

Life Savers - The Life Savers have been developed after review of the critical incidents in our business and worldwide fatal incident trends. Over 80% of our critical incidents are covered by these Life Savers. The Life Savers apply to everyone: employees, contractors, service suppliers and visitors. The Life Savers are intended to develop unconscious safety behaviours.

Critical Risk Standards - Our critical risks represent the specific areas in our organisation which, if not adequately managed, could result in a fatality. There is a technical standard for each of these critical risks. The following section provides an outline of each of the critical risk standards with an overview of the key requirements for each.

Incident classification and performance Standard

InfraBuild follows GFG's global standard for classifying and reporting incidents; the Incident Classification and Performance Reporting Standard, based on international standards and global industry associations. In InfraBuild, our safety performance doesn't distinguish between employees and contractors, we combine working hours and incident data for both.

Incident investigation

InfraBuild follows GFG's global standard for incident investigations to make sure incidents are effectively investigated to prevent reoccurrence and promote shared learning.

Auditing and Verification processes:

Infrabuild entities are self-insured, and performance of the safety management system is subject to external audits by the state safety regulators.

InfraBuild entities participate in a corporate assurance program. the program includes verification of general health and safety requirements, compliance to critical risk standards and safety maturity evaluation.

InfraBuild entities are required to complete self-assessments and critical risk inspections (specific task / activity) to check compliance to standard requirements.

Supporting Documentation:

The Annual InfraBuild Sustainability Reports provides demonstration on many of the above processes. Additional specific documentation to supports the above claims may be made available upon request.