

**SPANTECH MANAGEMENT SYSTEM**

# **SPANTECH POLICIES**

## Spantech Policies

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## 1. Occupational Health and Safety

Spantech is committed to providing safe and healthy working conditions for the prevention of work-related injury, ill health and psychosocial harm.

To deliver on this commitment we will:

- implement an integrated management system that complies with ISO 45001:2008 that is appropriate to our business, risks and opportunities
- set objectives that measure and evaluate our OH&S performance
- comply with legal and other requirements
- eliminate hazards and reduce OH&S risks
- continually improve our integrated management system, and
- consult and include workers in all aspects of the management system.

It is the responsibility of every employee to implement and comply with this policy and our integrated management system.



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## 2. Quality Assurance

Spantech is committed to ensure the high quality of our products, services and projects.

To deliver on our commitment we will:

- implement an integrated management system that complies with ISO 9001:2015
- set objectives that measure and evaluate our quality performance
- comply with legal requirements and our client's specifications, and
- continually improve our quality management system.

It is the responsibility of every employee to implement and comply with this policy and our integrated management system.



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### 3. Environmental

Spantech is committed to protecting the environment by preventing pollution and supporting sustainable development.

To deliver on our commitment we will:

- implement an effective environmental management system that complies with ISO 14001:2015
- set objectives that measure and evaluate our environmental performance
- comply with legal and other requirements, and
- continually improve our integrated management system and environmental performance.

It is the responsibility of every employee to implement and comply with this policy and our integrated management system.



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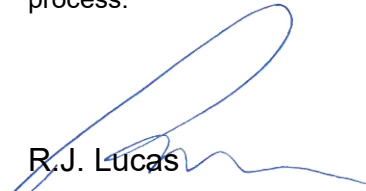
## 4. Rehabilitation

Spantech is committed to the rehabilitation of employees entitled to compensation for work related injury, illness or psychological harm.

To deliver on our commitment we will:

- implement an effective rehabilitation and return to work (RRTW) process
- comply with all relevant legal requirements
- respect the confidential nature of medical information
- support RRTW plans prepared by a medical practitioner
- consulting the injured employee about the RTW plan
- wherever practical, providing meaningful alternate duties
- commencing the RRTW plan as soon as possible
- ensure the injured employee has access to suitable treatment to assist in their recovery
- set objectives that measure and monitor our rehabilitation performance.

It is the responsibility of every employee to implement and comply with this policy and our rehabilitation process.



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## 5. Industrial Relations

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.

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 interested parties 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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## 6. Respect and Support

Spantech is committed to providing an inclusive, safe and respectful environment for all company members, clients and visitors to our workplaces that is welcoming, fair and supportive, free from all forms of discrimination, bullying and harassment. All company members are required to treat others with dignity, courtesy, and respect.

To deliver on our commitment we will:

- always demonstrate and promote appropriate standards of behaviour
- undertake our business activities in a safe, courteous and friendly manner
- provide training and skills development opportunities for our people
- maintain a culture that respects individual merits - not based on gender, age, race, sexual identity or situation
- provide resources and opportunities for workers to participate in health and wellbeing activities
- provide pathways to support for workers and their partners in situations of domestic violence
- support flexible leave options in line with the National Employment Standards (NES) and relevant agreements
- treat complaints in a sensitive, equitable and confidential manner, with necessary protections for reporting parties
- arrange appropriate assistance for affected parties
- engage and consult with our employees to continuously improve our approach and culture
- comply with relevant laws and regulations
- communicate company process for grievance / issue resolution to relevant parties
- instigating necessary action against parties found to be in breach of this policy.

It is the responsibility of every employee to implement and comply with this policy and our integrated management system.



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## 7. Drug and Alcohol

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:

- implement an effective process to prevent and effectively manage drugs and alcohol
- comply with legal requirements and other requirements
- ensure employees are provided drug and alcohol awareness training
- ensure workers understand the consumption of illegal drugs or alcohol is prohibited during work time, including rest and meal breaks, and is a serious breach
- ensure workers understand the use, sale or personal possession of illegal drugs at a Spantech workplace is a serious breach and may result in criminal prosecution
- encourage workers to report the use of prescription or pharmaceutical 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.

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



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## 8. Information Technology

Spantech is committed to the secure, professional, ethical and legal use of Information Technology (IT). Spantech aims to maintain a secure IT system, internet, email and social media assets for the protection of the company, employees, contractors, clients and other interested parties.

To deliver on our commitment we will:

- implement an information management process that includes IT security process
- adhere to Australian Cyber Security Centre (ACSC) guidelines, including Top 4 Mitigation Strategies (application whitelisting, patch management, user access control, and malware defences)
- adopt wherever practical Microsoft's recommended best practices
- ensure employees use IT (hardware, software and online platforms) in a secure, legal, professional and ethical manner
- ensure the intellectual property and confidential information of the company and interested parties is kept secure and confidential
- comply with legal reporting and privacy requirements
- comply with industry-specific standards (e.g. construction-related data handling guidelines) and any additional requirements of our clients.

This policy applies to all employees, contractors, and third-party service providers accessing Spantech's IT systems, including Microsoft 365, other cloud services, and on-premises infrastructure.

Deliberate breaches of this policy and related processes will lead to disciplinary action, with serious or repeated breaches by employees being dismissible offences.



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## 9. Code of Conduct

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 their Manager.



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## 10. Grievance and Issue Resolution

Spantech is committed to the right of every employee to raise a grievance with any 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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## 11. Website Privacy

Spantech is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The APPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information. A copy of the APP may be obtained from the website of The Office of the Australian Information Commissioner at [www.aaic.gov.au](http://www.aaic.gov.au).

### What is Personal Information and why do we collect it?

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect include names, addresses, email addresses, phone and facsimile numbers. This Personal Information is obtained in many ways including correspondence, by telephone, by email, via our website [www.spantech.com.au](http://www.spantech.com.au), from your website, from media and publications, from other publicly available sources, from cookies and from third parties. We don't guarantee website links or policy of authorised third parties.

We collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

When we collect Personal Information, we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

### Sensitive Information

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information. Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent, or where required or authorised by law.

### Third Parties

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

## Disclosure of Personal Information

Your Personal Information may be disclosed in a number of circumstances including the following:

- Third parties where you consent to the use or disclosure, and
- Where required or authorised by law.

## Security of Personal Information

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

## Access to your Personal Information

You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

Spantech will not charge any fee for your access request but may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your personal information, we may require identification from you before releasing the requested information.

## Maintaining the Quality of your Personal Information

It is an important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up to date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

## Policy Updates

This Policy may change from time to time and is available on our website.

## Privacy Policy Complaints and Enquiries

If you have any queries or complaints about our Privacy Policy, please contact us at [enquires@spantech.com.au](mailto:enquires@spantech.com.au).



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