

Work Health & Safety Policy



People and Performance and Group Operational Risk



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OVERVIEW

The Bendigo and Adelaide Bank (the Group) values its people and their wellbeing and regards Work Health and Safety (WHS) as paramount importance to the operation and success of its business.

This Policy sets out the commitment of the Group to providing safe and healthy workplaces for all workers, customers and other visitors. The Group takes all reasonably practicable steps to ensure the health and safety of persons affected by its business or undertaking.

This Policy applies to all Group workers and all Group workplaces and is supported by the Group Operational Risk Management Framework and related policies, standards and guidelines.

POLICY

1. Commitment to Work Health and Safety

The Group aims to have injury free workplaces and to comply with all WHS legal requirements. To achieve this aim, the Group has proactively implemented a number of supporting WHS Standards and Guidelines that will provide for the following objectives so far as reasonably practicable:

- The provision and maintenance of a safe work environment.
- The provision and maintenance of safe systems of work including safe plant and structures.
- The safe use, handling and storage of plant, structures and substances.
- The provision of appropriate information, training, instruction or supervision of all workers as necessary for them to perform their role safely.
- The identification of any hazards and associated risk at workplaces.
- The prompt implementation of risk control strategies to eliminate risks and, where that is not reasonably practicable, to minimise those risks so far as reasonably practicable.
- The provision of adequate welfare facilities at workplaces.
- Monitoring the health of workers and conditions at the workplace for the purpose of preventing illness and injury.
- Active participation in raising and resolving WHS issues.
- The promotion of active [rehabilitation](#) and [return to work programs](#) with the aim of ensuring a full return to pre-injury duties wherever possible. The Group recognises the importance of consultation between management and workers in matters relating to WHS and also engaging in consultation with other entities as necessary to ensure that common safety matters are the subject of consultation, co-operation and co-ordination.

The Group may also provide directions, advice and assistance to other entities associated with the Group in the management of health and safety matters by those entities, to assist them in the protection of the health and safety of their workers and others to whom they owe duties, so far as reasonably practicable.

Note: This may include Community Bank® companies and Agencies.

The Group has also articulated a set of responsibilities for its board and committees to assist in managing WHS. These are described in the Governance section of this policy.

GOVERNANCE

RESPONSIBILITIES FOR SPECIFIC ROLES

Role	Responsibilities
Workers and Other	Everyone at a workplace, including workers and others, are responsible for taking reasonable care for their own health and safety and taking reasonable care that their acts or omissions do not adversely affect the health and safety of themselves or others. Workers are also responsible for complying with the Group's WHS policies and standards, and for reporting incidents, near misses or hazards using the BEN Incident, Injury and Hazard report form .

Role	Responsibilities
<p>Health and Safety Representatives</p>	<p>The Group's health and safety representatives (HSRs) represent the health and safety interests of the members of their designated work group. The Group recognises the important role of HSRs and encourages their election to designated work groups. All reasonable support and assistance will be given to HSRs in exercising their rights and responsibilities.</p> <p>Powers and functions of HSRs may vary slightly from jurisdiction to jurisdiction but generally, HSRs have the following primary responsibilities:</p> <ul style="list-style-type: none"> • Take reasonable steps to keep themselves informed on WHS issues and encourage consultation between workers and management within their designated work group. • Provide advice, raise awareness or assist in the resolution of WHS issues within their designated workgroup or work area. • Accompany WHS Inspectors during inspection of their designated work group. • Assist management to identify hazards, assess risks and implement risk control measures. • Participate in WHS consultative forums and/or local WHS Committees in relation to WHS issues that affect their work group.
<p>Senior Manager, WHS</p>	<p>The Group Senior Manager, WHS has the following responsibilities:</p> <ul style="list-style-type: none"> • Assisting the Group in the implementation of this WHS Policy. • The ongoing review of this WHS policy and supporting WHS standards and guidelines, and making recommendations for any amendments. • Periodic reporting about WHS matters that will assist duty holders under this policy to fulfil their duties. • Monitoring, reviewing and analysing all reported injuries and hazards arising from the Group and Community Bank® companies, and determine whether appropriate corrective actions have been put in place. • Ensuring the reporting of notifiable incidents to external regulators, as per the WHS legal requirement in the relevant State or Territory.

Role	Responsibilities
Managers	<p>Managers within the Group with direct reports have the following responsibilities:</p> <ul style="list-style-type: none"> • Making sure the necessary WHS instruction, information, training or supervision is provided to their workers so they can safely perform their expected roles. • Making sure there are regular WHS inspections of the workplace so that hazards are identified and controlled. • Requiring people within their team to comply with relevant WHS policy and standards, and to use the safety management tools available to them effectively. • Promoting effective WHS consultation with Group workers, HSRs and contractors so information is disseminated and WHS issues are identified and resolved in a timely manner. • A manager who engages a contractor to provide services will confirm, as far as is reasonably practicable, that all workers providing the services receive all necessary WHS information, instruction, training or supervision to safely perform the services.
Group Operational Risk	<p>Group Operational Risk has the following responsibilities:</p> <ul style="list-style-type: none"> • Documenting the Operational Risk Management Policy and Operational Risk Management Framework (ORMF). • Independent monitoring and reporting of operational risk and loss events for the Group. • Development, implementation and maintenance of operational risk management tools to assist the identification, evaluation, control and treatment of operational risk across the Group. • Maintenance of databases for recording operational events identified throughout the Group. • Support and maintenance of the risk registers. • Recommending education and training in relation risk management practices and processes. • Ongoing maintenance of the ORMF.
Role	Responsibilities
Officers	<p>Officers within the Group will exercise due diligence over WHS compliance. This requires taking reasonable steps to ensure the Group entity for which they have responsibility complies with its WHS duties and obligations.</p> <p>Note: These obligations may extend to workers employed or engaged by entities other than Group entities.</p> <p>Due diligence includes taking reasonable steps to do each of the following:</p>

	<ul style="list-style-type: none">• Acquire and keep up-to-date knowledge of work health and safety matters within the entity.• Gain an understanding of the nature of the operations of the entity, and generally of the hazards and risks associated with those operations.• Ensure that the entity has available for use, appropriate resources and processes to eliminate or minimise risks to health and safety from work it carries out.• Ensure that the entity has appropriate processes for receiving and considering information regarding WHS incidents, near misses, hazards and risks and responding in a timely way to that information.• Ensure that the entity has, and implements, processes for complying with its duty under applicable WHS legislation.• Verify the provision and use of the above resources and processes.
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RESPONSIBILITIES OF GROUP COMMITTEES AND THE BOARD

Committee	Responsibilities
<p>Regional WHS Committee (RWS)</p>	<p>The RWS is a national committee, comprising elected Group health and safety representatives from across Australia and BEN Work Health and Safety Manager, with responsibilities set out in a charter.</p> <p>Note: At the date of this policy, the responsibilities are as follows:</p> <ul style="list-style-type: none"> • Providing a communication and consultation mechanism for Group and Community Bank® companies' workers, including input into the development of WHS policies and procedures. • Assisting in the consultation process by receiving and disseminating WHS information to and from designated working groups, Divisional WHS Committees and the Group WHS and Security Management Committee. • Monitoring the progress of WHS initiatives being implemented across the Group and considering their effectiveness. • Reviewing regional WHS training achievements and requirements. • Receiving updates on WHS legislation.
<p>Operational Risk Committee</p>	<p>The Operational Risk Committee is a sub-committee of the Executive Committee. It reports to the Executive Committee, with its responsibilities set out in a charter.</p> <p>Note: At the date of this policy, the responsibilities relevant to WHS are as follows:</p> <ul style="list-style-type: none"> • Monitoring the operational risk profile of the Group and branches of Community Bank® companies. • Monitoring the occurrence and treatment of significant loss events and compliance breaches, including WHS. • Considering any significant treated risks resulting from various types of risk assessment (including WHS and security reviews) and where appropriate approve the acceptance of this level of risk. • Considering the results of monitoring of key operational risks of the Group and the branches of Community Bank® companies. • Monitoring the development of operational risk policies and frameworks (including operational risk appetite and tolerances) with principles approved by the Board Risk Committee.

Committee	Responsibilities
Operational Risk Committee (cont)	<ul style="list-style-type: none"> Monitoring regulatory and legal changes impacting the Group and providing oversight and guidance on the program of regulatory change Directing the appropriate recording of any risk (including material WHS risks) to the business unit risk register where resolution of an escalated issue remains unresolved Referring any particular WHS matters to the Group WHS & Security Management Committee as appropriate.
Group WHS and Security Management Committee (GWS)	<p>The GWS is a sub-committee of the Executive with its responsibilities set out in a charter.</p> <p>Note: At the date of this policy, the responsibilities are as follows:</p> <ul style="list-style-type: none"> Providing effective leadership in WHS and security. Receiving and considering information on the performance and continuous improvement of WHS and Security within the Group. Reviewing, endorsing and/or approving WHS and Security operational strategies, plans, standards, procedures and guidelines. Reporting and/or referring matters (including recommendations) to the Executive relating to the: <ul style="list-style-type: none"> - Group WHS Policy; - Group WHS and Security Quarterly Performance Report; - WHS Continuous Improvement Plan; and - Any other WHS or Security issue it considers appropriate. Considering, advising and taking action on issues referred to it by the Executive Committee and of its own initiative. Referring relevant matters for escalation to the Operational Risk Committee. Receive and consider reports in relation to WHS and security issues within the Group, the branches of Community Bank companies and Agencies. Considering, advising and taking action on matters that are escalated from a Divisional level.
Executive Committee	<p>The Executive Committee is a committee established by the Managing Director. It is responsible for the following in relation to WHS:</p> <ul style="list-style-type: none"> Receiving and considering the Group WHS and Security Quarterly Performance Report. Receiving and considering any recommendations made by the Group WHS and Security Management Committee.

Committee	Responsibilities
<p>Executive Committee (cont)</p>	<ul style="list-style-type: none"> • Endorsing recommendations regarding health and safety, or the implementation of new policies or procedures as appropriate. • Recommending key WHS policies or standards to the Board Governance & HR Committee. • Referring matters for consideration to the Group WHS and Security Management Committee. • In relation to resources, responding to any specific requests, or acting on its initiative, to ensure that sufficient resources are available within the Group to undertake effectively all necessary WHS measures. • Exercising due diligence, by taking reasonable steps to ensure that the Group is meeting its WHS legal obligations. <p>Note: This may include in respect of employees employed or engaged by entities other than Group entities.</p> <p>The Committee also makes recommendations to the Board Governance & HR Committee on any changes to WHS practices that the Committee regards as necessary or desirable, for consideration by the Board Governance & HR Committee as appropriate.</p>
<p>Board Governance & HR Committee</p>	<p>The Governance & HR Committee is a sub-committee of the Board, with its responsibilities set out in a charter.</p> <p>Note: At the date of this policy, the responsibilities relevant to WHS are as follows:</p> <ul style="list-style-type: none"> • Receiving and considering the Group WHS and Security Quarterly Performance Report. • Considering recommendations of management in relation to key WHS policies and amendments to those policies and making recommendations to the Board. • Considering recommendations of management in relation to changes to the Operational Risk Management Framework which relate to WHS and approving any changes. <p>Note: Changes to the Framework must also be approved by the Board Risk Committee.</p> <ul style="list-style-type: none"> • Receiving and considering any recommendations proposed by management on changes to WHS practices. • Exercising due diligence, by taking reasonable steps to ensure that the Group is meeting its WHS legal obligations. • Example: This may include in respect of employees employed or engaged by entities other than Group entities.

Committee	Responsibilities
<p>Board Risk Committee</p>	<p>The Board Risk Committee is a sub-committee of the Board, with its responsibilities set out in a charter. Its purpose is to provide assistance to the Board in relation to oversight of risk, taking into account the risk profile and appetite of the Group, the overall business strategy and management expertise. This includes the establishment, implementation, review and monitoring of risk systems and policies for Operational risk, including regulatory compliance and business continuity. This includes approving any changes to the Operational Risk Management Framework.</p> <p>Note: Changes to the Framework which relate to WHS must also be approved by the Board Governance & HR Committee.</p> <p>Note: At the date of this policy, additional responsibilities relevant to WHS are as follows:</p> <ul style="list-style-type: none"> • Overseeing the establishment and implementation of risk management systems, and monitoring and reviewing those systems currently in place, relating to operational risk. This includes setting risk tolerance levels and recommending related/new policies to the Board for approval. • Monitoring and reviewing the operational risk profile and loss events across the Group (including Moderate and Extreme rated WHS loss events). • Providing oversight on the treatment of significant regulatory compliance risks and breaches. This includes oversight of escalation and rectification decisions. • Reviewing the activities and reporting of the management Operational Risk Committee. • Receiving the Operational risk report including analysis of significant risks, trends, risk profile (existing, new and emerging risks), operational risk loss summary incorporating analysis of significant operational losses and related treatment plans for the Group. • Receiving a consolidated overview of the risk and compliance declarations (six-monthly). • Annually, review and recommend to the Board any changes to the “Risk Appetite Statement”. At the date of this policy, in relation to WHS, the Risk Appetite Statement says: “The Group will not knowingly accept operational risk that improperly endangers the safety of its staff, customers, partners, contractors or other third parties”.

Committee	Responsibilities
<p>Board</p>	<p>The responsibilities of the Board are set out in a charter.</p> <p>Note: At the date of this policy, the responsibilities relevant to WHS are as follows:</p> <ul style="list-style-type: none"> • Exercising due diligence, by taking reasonable steps to ensure that the Group is meeting its WHS legal obligations. • Example: This may include in respect of employees employed or engaged by entities other than Group entities. • Receiving and considering the following. <ul style="list-style-type: none"> - The Group WHS and Security Quarterly Performance Report. - Any WHS policies and standards recommended by the Governance & HR Committee. - Any other matters brought forward by the Governance & HR Committee. • Responding to any specific requests for resources, to ensure that sufficient resources are available within the Group to allow them to undertake all necessary WHS measures effectively. <p>In addition, the charter provides for the Board to receive and consider recommendations from the Risk Committee annually on any changes to the “Risk Appetite Statement”.</p>

RELATED DOCUMENTS

Related documents which should be read in conjunction with this policy include:

- [Operational Risk Management Framework](#)
- Other documents relating to WHS are available from the [Intranet](#).

DEFINITIONS

Agencies	means third parties with an agency agreement with BEN, operating under the brand “Bendigo Bank”, to refer business or to provide day-to-day banking services.
Group	means Bendigo and Adelaide Bank Limited and its controlled entities.
Group WHS and Security Quarterly Performance Report	<p>means a report prepared on a quarterly basis by the Industrial Relations and Safety Department and provides information on the following.</p> <ul style="list-style-type: none"> • Work health safety performance of the Group and Community Bank® companies. • The measures taken or under way to ensure legal compliance and continued WHS improvement by the Group and Community Bank® companies. • Details of WHS incidents or near misses which have occurred at Group workplaces and at branches of Community Bank® companies. • Current WHS escalation processes, particularly in relation to key WHS risks at workplace, and branch security risk assessments for Community Bank® companies. • Other matters which may need to be brought to attention of Group Officers as they may arise, from time to time.
Officer	<p>means each of the following.</p> <ul style="list-style-type: none"> • A person who is director or secretary of a Group entity. • A person who makes, or participates in making, decisions affecting the whole, or a substantial part of, the business of a Group entity. <p>Example: Executive Committee members.</p> <ul style="list-style-type: none"> • A person who has the capacity to affect significantly the financial standing of a Group entity. • A person in accordance with whose instructions or wishes the directors of the Group entity are accustomed to act.
WHS	means Work Health and Safety.

Worker	<p>means any person engaged or who is caused to be engaged by a Group entity, or whose work activities are influenced or directed by the Group.</p> <p>Example: This may include workers employed or engaged by other entities.</p> <p>This includes each of the following.</p> <ul style="list-style-type: none"> • An employee of a Group entity. • A contractor engaged by a Group entity. • A sub-contractor, caused to be engaged by a Group entity. • A volunteer performing work for a Group entity. • A person seconded to or from a Group entity.
Workplace	<p>means any place where work is carried out by a worker. In the case of a worker, it includes any place where the worker goes, or is likely to be, while at work.</p> <p>Example: This may include vehicles (during travel for work), and homes (if a worker is working from home).</p>

REVIEW

This policy is to be reviewed every two years by People and Performance and Group Operational Risk, for recommendation through the Executive Committee and Board Governance & HR Committee for approval by the Board.

DOCUMENT CONTROL TABLE

Version No.	Approved by:	Date approved:	Date applicable:	Next review date:	Document owner:
3.0	BEN Board	July 2013	July 2013	July 2015	People and Performance and Group Op Risk
3.1	Mark Schultz	November 2014	November 2014	July 2015	People and Performance and Group Op Risk
3.2	Group Work Health Safety Committee	November 2015	November 2015	November 2017	People and Performance and Group Op Risk
3.3	Group Work Health Safety Committee	23 April 2018	April 2018	April 2020	People and Performance and Group Op Risk