



PROSEGUR

**ENVIRONMENT, HEALTH AND SAFETY
MANAGEMENT SYSTEM MANUAL**

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This EHS Management Systems Manual documents the EHS practices of the 24 elements that comprise the Prosegur EHS Management System. The EHSMS is known as “Safety Shop”.

Document Title:	Prosegur Environment, Health and Safety Management System Manual		
Issue Date:	18/01/16	Document Uncontrolled If Printed	Page 1 of 12

Index

Element 1	<u>Policy</u>
Element 2	<u>Organisation</u>
Element 3	<u>Planning</u>
Element 4	<u>Accountability</u>
Element 5	<u>Risk Management</u>
Element 6	<u>Education & Training</u>
Element 7	<u>Communication</u>
Element 8	<u>Rules & Procedures</u>
Element 9	<u>Inspections</u>
Element 10	<u>Incident Management</u>
Element 11	<u>Documents & Records</u>
Element 12	<u>Audits</u>
Element 13	<u>Injury Management</u>
Element 14	<u>Industrial Hygiene Management</u>
Element 15	<u>Legal & Regulatory Compliance</u>
Element 16	<u>Ergonomic Management</u>
Element 17	<u>Emergency Preparedness</u>
Element 18	<u>Management of Contractors</u>
Element 19	<u>Motor Vehicle Safety</u>
Element 20	<u>Hazardous Energy</u>
Element 21	<u>Elevated Work</u>
Element 22	<u>Confined Space Entry</u>
Element 23	<u>Powered Industrial Vehicles</u>
Element 24	<u>Environment</u>

Document Title:	Prosecur Environment, Health and Safety Management System Manual		
Issue Date:	18/1/16	Document Uncontrolled If Printed	Page 2 of 12

 Prosecur Management System Manual		Document No: 2-001 Revision No: 2 Issue Date: 18/1/16 Next Review: 18/1/19
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Purpose and Intent

This manual outlines how the business addresses its commitments to occupational health and safety and the environment. Each of the 24 elements contain detailed procedures that stipulate requirements for meeting legislative obligations under the Comcare Self Insurance scheme in addition to environmental responsibilities. This manual provides an overview of how Prosecur manages safety and the environment rather than a detailed description. Further details can be found by referring to the specific procedures associated with each of the 24 elements

The EHS management system is developed in accordance with the following:

- AS/NZS 4801
- SafetyMap

The EHSMS is known as Safety Shop. The “face” of Safety Shop is an intranet site available to all employees who use a business computer. Employees without computer access are made aware of safety and environmental requirements via training and tool box talks.

Scope

This Environment, Health and Safety (EHS) Document applies to all Prosecur sites.

Element 1 – Policy

a) Policy

Policies are signed by the Managing Director and reviewed every 2 years. The policies are:

- Occupational Health & Safety
- Environment
- Injury Management & Rehabilitation
- The wearing of Jewellery while at work
- Drug and Alcohol
- Fleet Safety

b) Leadership

The Managing Director is responsible for providing overall strategic direction for the EHS program.

Document Title:	Prosecur Environment, Health and Safety Management System Manual		
Issue Date:	18/1/16	Document Uncontrolled If Printed	Page 3 of 12

The Managing Director shall visibly demonstrate commitment and leadership by example and through activities as follows:

- by ensuring EHS is incorporated into business decision-making processes in all functional areas.
- by participating in EHS activities which interface directly with employees (e.g., meetings, inspections, audits);
- by expecting employees to evaluate and mitigate possible EHS risks before starting each task;
- by creating a culture where employees think about EHS at work and at home; and
- by providing leadership and fostering participation in external EHS groups where such activities provide value to the business.

c) Written Program

This EHS Management System Manual has been developed as a written description that defines how Prosegur implements and maintains the EHSMS. It shall be periodically reviewed in response to changes in the organisation or on a regular basis during the audit process.

Element 2 – Organisation

a) National EHS Council

This document will serve as the Council's written charter and will be reviewed regularly and revised as necessary.

The purpose of the Council is to direct, coordinate and monitor progress of overall EHS efforts. The Council shall monitor the adequacy of financial, human and technical resources to ensure they are available to support line management's implementation of the EHS initiatives.

The Council shall be chaired by the Managing Director and shall consist of his/her direct reports and others who may appointed by the Managing Director as appropriate.

The National EHS Manager will act as consultant and advisor to the Council.

The Council shall meet regularly and the Managing Director shall ensure minutes of the meetings are recorded. The agenda for each meeting shall be developed by the National EHS Manager in consultation with the Chairperson. The following shall be addressed periodically by the National EHS Council during the course of the year.

The Council shall:

- review and approve national policies, annual EHS plan, audit results, and other initiatives;
- approve the necessary human and financial resources;
- review status of on-going programs, and progress to goals/targets;
- review regulatory compliance status;
- provide direction to line and functional staff;
- sustain interest and communications in EHS throughout the Operation;
- establish issue-specific subcommittees, as necessary;
- ensure that appropriate procedures, programs and activities are in place;
- ensure employee understanding of EHS policies, procedures, programs, and other initiatives;

Document Title:	Prosegur Environment, Health and Safety Management System Manual		
Issue Date:	18/1/16	Document Uncontrolled If Printed	Page 4 of 12

- ensure that adequate technical skills are available to the Operation; and,
- ensure employee participation in the development and implementation of EHS programs and activities (e.g., involvement in the development and review of policies and procedures to manage risks, representation on EHS committees, participation in self inspections, communications, hazard identification and control, and root cause analysis).

The General Managers as appropriate shall appoint EHS Councils for each State/region to support and disseminate information from the National EHS Council. These State/Region Councils shall be chaired by the General Manager.

b) Roles and Responsibilities of Senior Management, Line Management, EHS Staff, and general employees

The role of senior management is to ensure development of an effective and comprehensive EHS program within the organisation. The role of line management is to implement and sustain an effective EHS management system throughout the organization. The role of EHS staff is to establish the framework for the EHS program, and to actively engage with the Line Management in developing, implementing and sustaining the program.

d) Responsibilities of all employees.

Each employee is responsible for:

- immediately reporting all incidents (injuries, illnesses, near misses, spills, etc.), hazardous conditions, and emergencies to their supervisor.
- performing an assessment of risk of their work activities, taking corrective action and preventive actions as necessary.
- properly using and maintaining assigned control measures such as engineering controls.
- Complying, at all times with EHS regulations / policies / programs / rules.
- using personal protective equipment (PPE).
- participate in EHS training programs and taking personal responsibility for their safety.

e) EHS Coordinators.

Each state/region has a designated EHS Coordinator. The EHS Coordinators liaise with the National EHS Manager and assist with bringing new EHS initiatives into the business units.

Element 3 – Planning

An annual Plan shall be drafted each year and shall contain key issues from Assessment, Prevention and Control, Inspections and Management Audits, Incident Investigations, and Program Evaluation.

The Annual Plan will contain measurable short term (1 year) goals that are aggressive and achievable. The Plan will address specific details for the upcoming year. The measurable goals will be supported by key initiatives or activities to achieve the goals and will have target dates for completion. Responsible parties will be identified to complete these key initiatives or activities and will be held accountable for timely implementation.

The Annual Plan will be developed in Q4 each year. The plan will be reviewed periodically by the National EHS Council to monitor progress.

Document Title:	Prosecur Environment, Health and Safety Management System Manual		
Issue Date:	18/1/16	Document Uncontrolled If Printed	Page 5 of 12

The Annual Plan will include;

- measurable objectives and goals/targets;
- related activities planned to achieve objectives and goals/targets that are consistent with the EHS policy;
- significant hazard and risk reduction;
- actions to ensure compliance with legal requirements and company requirements;
- actions identified from the results of program evaluation/assurance reviews, if not managed in an external corrective action system; and
- emerging business issues with EHS impact.

Implementation of the plan may be adjusted based on changes in business plans or direction.

The plan will be drafted by the National EHS Manager with input and approval by the National EHS Council.

Element 4 – Accountability

All employees are accountable for implementing assigned responsibilities and activities to attain EHS goals/targets and objectives and to comply with applicable policies, rules, procedures, and regulations through the disciplinary process and performance management process. Their EHS performance shall form part of the evaluation criteria of annual PFT's.

Operations and functional management, at all levels, are held accountable for the EHS goals/targets, objectives and activities to support the company's EHS plan, and for management practices implemented in their area of responsibility.

EHS is incorporated as part of the pay for performance program and EHS is a key element of job descriptions, personnel objectives, and as a part of the PFT process.

Compliance with the company's EHS policy and procedures is a condition of employment. Failure to comply may result in disciplinary action up to and including termination of employment.

Element 5 – Risk Management

This element is structured along the requirements of AS/NZS ISO 31000:2009 "Risk Management Principles & Guidelines". The risk management process has 4 levels:

1. Holistic Risk Management

This defines the key risks as viewed by the National EHS Council. The process uses the NSCA (National Safety Council of Australia) risk assessment tool which has the dimensions of "Probability", "Exposure" and "Consequence".

2. General Risk Assessments

This process is used for SWMS's (Safe Work Method Statements) and the National Hazard Register and utilises a 1 - 20 rating based on a 2 dimensional risk matrix.

3. The CSI (Customer Service Information) process

Document Title:	Prosecur Environment, Health and Safety Management System Manual		
Issue Date:	18/1/16	Document Uncontrolled If Printed	Page 6 of 12

This process relates specifically to cash in transit activities associated with customer sites. The process meets obligations the business has under the “Managing Cash-In-Transit Security Risks” 2013 Code of Practice.

4. National Hazard Register

All branch or site hazards that are not immediately controlled are added to the Register. Registers are viewed monthly by the National EHS Council and various State/Region EHS Councils.

Element 6 – Education and Training

Prosegur has an extensive process for training all employees. Training is managed by the National Training Department. All aspects of training are recorded on a training database.

Element 7 – Communications

The National EHS Council is responsible for ensuring EHS issues and information are communicated both internally and externally and considers:

- EHS issues and information to be communicated including the EHS Policy, EHS Objectives and Targets, Significant EHS Aspects/Hazards, EHS performance (i.e., metrics), EHS incidents, rules and procedures, and general EHS issues;
- The intended audience (e.g. employees, customers, contractors, regulatory agencies);
- Specific communication methods such as EHS meetings, bulletin boards, on-site publications, the Prosegur Intranet, EHS toolbox meetings and incident/safety alerts;
- A process to solicit and evaluate stakeholder feedback; and
- A process for communicating lessons learned and safety alerts internally and externally.

The Safety Shop intranet site is the key focal point for the business and can be accessed by managers, supervisors and employees as required.

Element 8 – Rules and Procedures

Prosegur has developed written EHS rules and procedures to ensure company operations are conducted in a manner that safeguards employee health, safety and the environment.

All Prosegur employees must adhere to established EHS rules and procedures as a condition of employment. Supervision and management shall consistently enforce adherence to these consistent with normal operating practices.

Violation of established EHS rules and procedures may result in disciplinary action up to and including termination of employment.

The National EHS Manager will coordinate the development of Rules and Procedures with input from affected employees, supervisors and managers and will be communicated to affected employees by EHS intranet site, toolbox talks, team meetings and EHS training.

Compliance with EHS Rules and Procedures will be monitored through Inspections, Audits and the annual Program Evaluation.

Document Title:	Prosegur Environment, Health and Safety Management System Manual		
Issue Date:	18/1/16	Document Uncontrolled If Printed	Page 7 of 12

Specific procedures relating to Armoured Vehicles Operations are located within the Training Intranet site. Element E08 on Safety Shop contains specific safety procedures that do not fall into the other system element categories (ie. the 24 element categories of the EHSMS).

Element 9 – Inspections

The goal of the Inspection Program is to mitigate hazards, reduce risks, and ensure compliance with the WHS regulations and Prosecur Policies and Procedures.

Inspections are conducted and documented in the following areas:

- Premises
- Offices
- Vehicles
- Powered Industrial Vehicles
- Equipment

Inspections are performed using checklists and protocols that identify regulatory compliance issues, unsafe/improper work conditions, behaviour of employees, and workplace hazards (i.e. facilities, equipment, and chemicals).

The results of the inspections will be tracked and analysed at State/Regional level. Inspections compliance is a key lead indicator that is tracked monthly by the National EHS Council.

Element 10 – Incident Management

Prosecur investigates all significant EHS incidents, identifying root cause(s) and for implementing corrective actions. All incidents are required to be reported, reviewed and investigated to a level commensurate with the actual or potential consequence of the occurrence.

a) Investigations

The incident investigation process is managed by the National EHS Manager and supported by the State and Region based EHS resources with responsibility to ensure that the investigations are done in a timely manner and in accordance with the Incident Reporting Procedure.

Incident Investigations are conducted for all Environmental, Health and Safety incidents. EHS incidents are defined as any unplanned event or condition which results in or has the potential (near-miss) to result in any of the following:

- injury or illness;
- property damage;
- adverse impact to the environment;
- adverse public opinion; or
- a condition of legal non-compliance.

b) Serious Incidents

- Any life-threatening injury (as indicated by the treating physician or medical professional);
- Any injury resulting in paralysis;
- Fractures to multiple limbs, the head, or back, or multiple fractures to the same limb;
- Any injury that results in the loss of a body part or function, such as amputation or loss of vision;

Document Title:	Prosecur Environment, Health and Safety Management System Manual		
Issue Date:	18/1/16	Document Uncontrolled If Printed	Page 8 of 12

- Loss of consciousness; or
- Any bullet wound.
- Any incident involving an employee or contractor, as determined by the operating unit's supporting EHS resource, which could reasonably have resulted in loss of life or serious injury.

Prosecur acknowledges its responsibility under section 35 of the WHS Act 2011 to notify Comcare regarding "notifiable incidents".

c) Root Cause, Corrective and Preventive Action

The National EHS Manager is responsible for reviewing serious incident investigations to assure root causes are properly identified, and follow up on corrective action closures. Incidents, and trending of incidents, will be discussed at EHS Council meetings.

Element 11 – Documents and Document Management

Prosecur will create, distribute, control and manage EHS documents and records in support of the EHS Program. Targeted materials are those which have legal requirements, or those that are required by the Management Systems.

a) Documents

There are two types of EHS documentation, written and electronic. The National EHS Manager is responsible for determining the type of documentation for various EHS programs, the method for retaining and distributing documents, and controlling those methods to ensure current versions of the documents are available for use.

Safety Shop is the intranet site that contains all the relevant procedures, forms and templates. The National EHS Manager is responsible for the document control of Safety Shop.

b) Records

The details of record management are included in the Document and Record Management Matrix.

That Matrix includes details on:

- how records will be distributed and maintained;
- responsibility for maintaining records;
- types of EHS records to be retained;
- the retention and archival times for each type of record;
- the location of file for each type of record;
- how security and confidentiality will be maintained;

Electronic records containing sensitive data shall be kept in a recognised & readable software format (such as Word documents, Excel spreadsheets, etc.) that is up-to-date with the current software format. Appropriate password protections shall be used.

Document Title:	Prosecur Environment, Health and Safety Management System Manual		
Issue Date:	18/1/16	Document Uncontrolled If Printed	Page 9 of 12

Element 12 – Audits

Audits are a systematic, documented review of branch offices against EHS procedural requirements.

The business utilises the following audit regimes:

1. Comcare Recertification Audits

These are conducted by Comcare every 4 years. The audits utilise the Comcare national audit tools for safety, workers compensation and injury management.

2. Comcare Internal Audits

Typically a qualified external resource is used to conduct annual audits as per the Comcare national audit tools for safety, workers compensation and injury management.

3. Internal Audits

These are conducted by the National EHS Manager as per the National EHS Plan.

4. Leadership Audits

Are short, targeted specific audits conducted by the General Managers.

5. In Field Audits

These audits are conducted on cash in transit operations (employees and contractors).

Audit results as per 1 – 4 above are reviewed by National and State/Region EHS Councils. In Field Audit results are reviewed by State Security Managers and General Managers as appropriate.

Annual Evaluation

Each year the National EHS Manager reviews the various audit results and provides the National EHS Council with a compliance score. The score reflects the overall “health” of the EHSMS and safety compliance.

E13 – Injury Management

Injury and illness case management is overseen by the National Workers Compensation Manager who coordinates the injury/illness management system, maintains contact with government agencies, and coordinates insurance company activities.

All occupational injuries and illnesses must be reported promptly by employees to line supervision and compensable injuries must be reported promptly to the injury compensation administrator.

Case management, injury management and rehabilitation are conducted as per the requirements of the Safety, Rehabilitation and Compensation Act 1988.

Document Title:	Prosecur Environment, Health and Safety Management System Manual		
Issue Date:	18/1/16	Document Uncontrolled If Printed	Page 10 of 12

E14 - Industrial Hygiene Management

Prosegur has an active process to manage issues (or potential issues) associated with industrial hygiene. This includes:

- Noise
- Air quality
- Contamination
- Needle sticks

Testing is conducted by external qualified consultants as required. The National EHS Plan includes aspects relating to required testing.

E15 – Legal and Regulatory Compliance Management

Prosegur understands its obligations to abide by all legal and regulatory requirements. Changes to WHS or environmental legislation is monitored by the National EHS Manager and communicated as required. Legislative updates are an agenda item in the National EHS Council meetings.

E16 – Ergonomic Management

The purpose and scope of the ergonomic initiative is to improve workplace design to prevent ergonomic related injuries. Ergonomics management must incorporate ergonomic design concepts into the factory, office, warehousing, plant and engineering areas. An assessment of ergonomics is to be performed regularly as part of the EHS program evaluation

The document “Manual Handling” outlines the processes adopted by the Prosegur to coordinate the ergonomics program including identification, assessment, and development of corrective action or prevention methods regarding ergonomics problems.

E17 – Emergency Preparedness

In addition to specific security procedures Prosegur ensures that all sites and branches have effective fire protection and emergency equipment. All sites and branches must routinely conduct emergency drills to ensure that emergency procedures are effective.

E18 – Management of Contractors

Contractors are assessed based upon their EHS programs, training for employees, safety records by submitting requested information. The business units are responsible for specific work-area hazards instruction and for auditing and monitoring the contractor for EHS performance.

Prosegur has a 4 part procedure that deals with:

- Construction Work
- High Risk Construction Work
- Security Functions
- Minor Works

Document Title:	Prosegur Environment, Health and Safety Management System Manual		
Issue Date:	18/1/16	Document Uncontrolled If Printed	Page 11 of 12

E19 - Motor Vehicle Safety

Prosegur regularly reviews the risks associated with driver safety. All armoured vehicle operators are required to be trained and assessed on driver safety.

All CIT vehicles are checked each day before being used.

E20 - Control of Hazardous Energy

Branches are required to ensure procedures are in place to prevent injuries from the unexpected release or transmission of machine equipment/process energy during work, where personnel are exposed to hazardous energy sources from machines, equipment or processes.

Employees are routinely reminded that only qualified personnel are to conduct electrical works and that guarding and protective barriers on equipment must not be removed or de-activated.

All electrical equipment must be tested and tagged. Workplace inspections include the requirement that equipment is tested and tagged.

E21 - Elevated Work

The document “Working at Heights’ outlines the processes applied across all Prosegur sites to minimise hazards associated with working at heights while the document “Safe use of Ladders” outlines processes applied to the specific working at height issues associated with ladders.

E22 - Confined Space Entry

Technically cash vaults within branches are not deemed “confined spaces”. However, all vaults are marked as non hazardous confined spaces and have emergency procedures displayed. Staff that work in or access vaults are given annual tool box talks on vault safety.

E23 – Powered Industrial Vehicle Safety Program

Powered industrial vehicles (PIV) include forklifts and walkie stackers. All branches that have such equipment have a documented risk assessment and safety plan. All PIV’s are checked before use via the completion of formal checklists.

E24 – Environment

Although Prosegur has no significant waste streams the business does believe in respecting our environment. In this regard a “carbon footprint” is maintained and where possible green house gas reductions are made (eg. new vehicles being more greenhouse gas friendly).

The business also has recycling programs and recycling data is maintained by the National EHS Manager.

Document Title:	Prosegur Environment, Health and Safety Management System Manual		
Issue Date:	18/1/16	Document Uncontrolled If Printed	Page 12 of 12