

Policy	Contractor Management Standard		
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Contractor Management Standard

Coverage

This policy is for internal use within Tasman Tourism Pty Ltd (ABN 24 637 343 983), Tasman Tourism New Zealand (CN 7905336) and all related entities now and yet to be established in the future (collectively referred to in this Policy as Tasman Holiday Parks or the Company).

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Definitions

Contractor - An individual, company or other legal entity who is directly engaged by the Company to carry out work or provide a service and is not a Company employee. This term also refers to a person or company engaged in delivering labour or skills as an independent contractor and paid on an invoice.

Sub-contractor - An individual, company or other legal entity directly engaged by a third party to carry out work or provide a service. A subcontractor can only carry out work or provide a service on Company controlled sites via engagement by an approved Company contractor.

SWMS (Safe Work Method Statement) - is a document that sets out the high-risk construction work activities to be carried out at a workplace, the hazards arising from these activities and the measures to be put in place to control the risks.

- One SWMS can be used for work that involves multiple high-risk construction work activities, for example, a work activity that requires using a mobile-powered plant, working at heights of more than 2 meters and working adjacent to a road used by traffic other than pedestrians.
- A SWMS is classed as an administrative control and is used to support higher-order controls to eliminate or minimise risks to health and safety, for example, engineering controls.
- A SWMS is generally different from other documents that focus on specific tasks or processes, such as a Job Safety Analysis or a Safe Operating Procedure. A SWMS is not intended to be a procedure - instead, it is a tool to help supervisors and workers confirm and monitor the control measures required at the workplace.
- A SWMS must identify the work that is:
 - o high-risk construction work
 - o specifies hazards relating to the high-risk construction work and the risks to health and safety
 - o describes the measures to be implemented to control the risks, andTo describe how the control measures are to be implemented, monitored and reviewed.

JSO (Job Safety Observation) - A formal documented process to verify that task-related hazards and risks have been identified and that the agreed control measures are implemented. The JSO intends to ensure hazard control measures effectively manage identified risks and provide feedback to the worker team of potential improvements to minimise the risk of further injury or harm.

JSEA (Job Safety Environmental Analysis) - is a form of risk assessment, which details step-by-step how a task is to be carried out safely. Other than the employer's general duty of care to ensure workers are trained and competent for their work, there are no specific legal requirements to have a JSEA or any regulations prescribing the format or content for JSEA's; there are three main components:

- Tasks - A step-by-step list of the basic activities of the task, e.g. start machine.
- Hazards – List of potential hazards at each step of the task
- Control Measures - Step-by-step instruction on how to safely carry out the task by controlling each identified hazard.

New Zealand SSSP (Site-Specific Safety Plan) is developed by subcontractors and main contractors to make sure that all relevant site information is available and regularly updated and that health and safety is habitually and consistently monitored.

Hazard - A source or a situation with a potential for harm in terms of human injury or illness, property damage, damage to the environment or a combination of these.

Hazard Identification - The process of recognising that a hazard exists & defining its characteristics.

Near miss - An event that could have resulted in human injury or damage to property, process or the environment but did not.

Risk - In the Context of this procedure, the likelihood & consequence of injury or harm occurring.

Risk Control - Risk Avoidance reduces the risk to zero. Usually, this can only be achieved by eliminating the hazard or ceasing the activity.

Risk Reduction - may involve reducing the likelihood of harm occurring or reducing the consequence if an unwanted event occurs.

Hierarchy of Control - A sequence of Risk Control categories listed in order of effectiveness & arranged in 3 levels:

- Level 1: Elimination of the hazard or risk
- Level 2: Substitution Controls, isolation Controls and engineering Controls
- Level 3: Administrative Controls and personal protective equipment (PPE)

High-Risk Activity

The following are high-risk construction activities as prescribed in the WHS Regulation. Work that involves:

1. Risk of a person falling more than 2 metres
2. Working on a telecommunications tower
3. Demolition of an element of a structure that is load bearing or otherwise related to the physical integrity of the structure.
4. The disturbance of asbestos or asbestos-containing materials (ACM).
5. Structural alterations or repairs that require temporary support to prevent collapse
6. Work that is carried out in or near a confined space
7. Work that is carried out in an area that may have a contaminated or flammable atmosphere
8. Work that is carried out in or near a shaft or trench with an excavated depth greater than 1.5 metres
9. The use of explosives
10. Working on pressurised gas distribution mains or piping, chemical, fuel or refrigerant lines, energised electrical installations or services
11. Tilt-up or precast concrete
12. Work that is carried out on, in or adjacent to a road, railway, shipping lane, or other traffic corridor that is in use by traffic other than pedestrians
13. Work that is carried out in an area at a workplace in which there is any movement of mobile-powered plant
14. Work that is carried out in an area in which there are artificial extremes of temperature
15. Work that is carried out in or near water or other liquid that involves the risk of drowning
16. Involves diving work

Scope

This standard applies to work performed on Company controlled sites by external Contractors (collectively referred to in this standard as contractors) for the following, but not limited to, core activities/processes.

- Civil works – clearing, levelling, and installation of drainage, underground services and road infrastructure
- Installation of prefabricated domestic dwellings - including footings and associated structures (carports, decks, stairs/ramps)
- Construction of in situ tourism / annual dwellings
- Finishing trades – plastering, painting, tiling and floor coverings
- Connection/disconnection of water, sewer, gas and electrical services
- Landscaping
- Suppliers, where the scope of work involves activities, such as unloading, loading, decanting, installation, commissioning and warranty maintenance
- Repairs and maintenance to buildings, roadways, landscape/gardens and essential services (electricity, water, gas, sewer)
- Specialist service providers and consultants.

Purpose

- The purpose of the Contractor Management Standard is to describe the risk management requirements associated with the engagement and management of contractors and their workforce.
- The intent of this standard is to ensure:
 - o Environmental, Health and Safety (EHS) risks associated with contracted activities are identified and effectively managed
 - o Contractors are assessed and selected to perform work on behalf of the Company, based on their capability to perform work in accordance with Company EHS management system – Safety Culture.
 - o Contractor EHS performance is consistently monitored, reviewed, and managed; and minimum contractor insurances are specified and managed.

EHS Commitment Statement

Coverage

This policy is for internal use within Tasman Tourism Pty Ltd (ABN 24 637 343 983), Tasman Tourism New Zealand (CN 7905336) and all related entities now and yet to be established in the future (collectively referred to in this Policy as Tasman Holiday Parks or the Company).

Scope

This policy applies to all Company employees, directors, temporary workers, and independent contractors (collectively referred to in this policy as team member/s).

Corporate Commitment Statement

Tasman Holiday Parks acknowledges its legal and moral obligations to safeguard the health and safety of all persons at the workplace, including team members, residents, casual occupants, guests and visitors.

The Company is compelled to:

- Deliver appropriate health, safety training, information, and instructions to all workers
- Conform with all relevant work, health and safety legislation and code of practice
- Provide safe systems, plant and equipment
- Implement safety and risk management systems and processes relevant and suitable for the Company's risk exposure and scope of operations to minimize risk as much as practicable
- Ensure all managers remain directly responsible and accountable for their workers' health, safety, and welfare and have been provided with adequate resources, as required
- Maintain relevant policies, systems, information, training, and Company structures to support and communicate Company health and safety practices across the business
- Uphold a positive safety culture through the promotion of consultative health and safety initiatives
- Respond to, reporting, and investigating all incidents promptly
- Manage the health and welfare of injured workers through documented injury management and Rehabilitation processes to prioritize a return to the workplace at the earliest opportunity; and
- Provide a safe and healthy environment for visitors, customers, and our team members.

Team members, contractors and visitors have a duty of care, which includes:

- Taking reasonable care for their health and safety
- Taking proper care to ensure their acts or omissions do not adversely affect the health and safety of others
- Complying with any valid policy, procedure or instruction implemented by the Company or Management.

The Company will take all practical steps to continually enhance health and safety standards throughout the business and uphold its core values of Communication, Integrity, Respect, Quality, Teamwork, Continuous Improvement, Safety and Fun.

Nikki Milne
Chief Executive Officer

Responsibility

Contract Owner

- Overall EHS performance under an individual contract/service arrangement
- Managing EHS over the contract lifecycle (pre-engagement, engagement/on-boarding, monitor and review) to ensure contractors meet the Company's EHS expectations and the requirements under this standard.
- The contract owner may delegate their responsibilities and obtain whatever assistance is necessary to help them meet their accountabilities. However, the contract owner remains the single point of accountability for ensuring that the performance requirements under this standard and the contract are met.
- The contract owner must notify the contractor of changes to Company policies, standards, processes and procedures during the contract term, which impacts the EHS requirements of the contract.

Company EHS Advisor

- Evaluating High-Risk Contractor's EHS pre-qualification assessment and any additional documentation or evidence submitted by the contractor in the pre-engagement stage.
- Advising the contract owner as to appropriate contractual EHS requirements during the engagement phase.
- Assist with the reviewing and evaluation of EHS documentation such as Contractor EHS improvement plans, EHS Management Plans, Safe Work Method Statements and EHS Contractor Assurance Plans.
- Assisting the Contract Owner in monitoring and evaluating the contractor's EHS performance.
- Providing specialist EHS advice throughout the work planning, contract development, contractor selection, contract management, monitoring and reviewing processes.

On-site Company Representative

- The Company contract site representative is responsible for monitoring, reviewing and reporting on contractor EHS performance for work at one or more controlled site(s), as delegated by the contract owner.
- The site representative must also check and ensure only approved and site-inducted contractor workers enter the site.
- For the purposes of this standard, with the approval of the Operations Manager (OM), this may be delegated to a Park Manager.

Requirements

The EHS Contractor Management process comprises several vital stages: pre-engagement, selection, engagement/on-boarding in Safety Culture, the commencement of work and monitoring and review.

Pre-engagement

- The Contract Owner is responsible for completing the Scope of Work
- This document contains sufficient information detailing the work or services required to be performed by the contractor, including the likely materials and equipment, applicable working hours, description of the access to the physical location, minimum work site delineation controls (e.g., temporary fence) and site-specific requirements.
- When the Contract Owner has completed the Scope of Work document is to assess and establish the Contractor Risk Level based on the proposed scope of work and the contractors core capabilities.
- The review process through the online platform, Safety Culture registration onboarding, will determine if the contractor is a High, Moderate or Low Risk and the applicable contractor engagement requirements, as described in the Contractor Risk Level Matrix below.

Contractor Risk Level Matrix

Contractor Risk Level	Example Contractor Activities	Contractor Management Processes
High	<p>Contractors performing any High-Risk Activities e.g.</p> <ul style="list-style-type: none"> - Supply and erection of new buildings/cabin stock - Construction of any load-bearing structure - Working at heights (>2m) - Major electrical infrastructure work (including high voltage electrical work) - Mobile plant operation (bobcats, excavators, forklifts, trucks, etc.) - Crane lifting / loading / unloading. - Transport/handling/use of industrial hazardous substances (non-domestic) - Confined space entry - Building or structure demolition 	<ul style="list-style-type: none"> - Contractor registration and pre-qualification assessment (review by EHS Advisor) - Online inductions for all personnel, including subcontractors. - Contractor's overarching Health and Safety (H&S) management system/framework - License and training records - Insurances - Site-specific induction - SWMS for all high-risk construction activities - Traffic Management Plan - JSEA for all other tasks - Safety Data Sheets (Hazardous Substances only)
Moderate/Low	<p>Contractors performing the following tasks e.g.</p> <ul style="list-style-type: none"> - General building, facilities and key plant - maintenance, minor repairs, finishing trades (excluding above activities) and servicing tasks - Garden Maintenance – domestic garden equipment, materials, domestic chemicals, and substances only - Plumbing and electrical repairs and maintenance - Manual Labour - Entertainers – musicians, kids' club etc. - Building/Office/Room Cleaning (domestic type) 	<ul style="list-style-type: none"> - Contractor registration and online induction for all personnel, including subcontractors. - Site-specific induction - Insurances - License and training records (where relevant) - JSEA for all tasks - Safety Data Sheets (Hazardous Substances only) - Working with Children clearance (state-based) <p>** some requirements are specific to only certain contractors</p>

Selection

- After contractor submissions have been received, each is to be evaluated by the Contract Owner. The evaluation needs to consider the following key criteria.
 - o Capability
 - o Availability
 - o Quality of tender, bid, quote and level of detail
 - o Price
 - o References from previous clients – quality, safety, timely, reliability

Engagement

- When the preferred contractor has been selected, they will be required to register their business via the online platform, Safety Culture. The contractor must provide all company details and upload copies of current mandatory insurances and required industry licenses (e.g., building, plumbing, electrical contractor)
- The contractor is also required to induct all workers and subcontractor workers in the online platform, Safety Culture before commencing work on site
- The Contract Owner is responsible for providing the email to the contractor requesting they complete the EHS Contractor Management set up
- The EHS Team is responsible for confirming all information that the contractor has registered is complete and up to date for the contractor before work commences on site
- Where the preferred contractor has been assessed as a High-Risk Contractor, the contractor's health and safety management system will be assessed and evaluated by the EHS Team. This assessment is conducted via the Contractor Prequalification Assessment process in the online platform, Safety Culture. This process is undertaken to determine how the contractor can demonstrate they will meet their PCBU obligations and how well they satisfy Company minimum H&S requirements. This will include:
 - o Health & Safety leadership
 - o Risk management processes, including the development of project-specific SWMS / JSEA's (NZ – SSSP).
 - o On-site supervision and formal monitoring processes
 - o Worker competency, qualifications and training programs
 - o Subcontractor engagement and management processes
 - o Plant and equipment inspection and maintenance programs
 - o Planned EHS management meetings, toolbox talks, and pre-start meetings as required
 - o EHS monitoring program, including observations, inspections and audits
 - o Incident reporting, investigation and management processes.
- Where deficiencies or gaps are identified during the pre-qualification process, a corrective action plan will be required to be completed by the Contract Owner before engaging the contractor. The contractor will be required to agree to the corrective action plan and update the progress of addressing each action.
- Contractor health & safety Key Performance Indicators (KPI) will be assigned to each contractor performing work continuously on The Company controlled sites for a period of greater than one month. The KPI's will be included in the awarded Contract or Purchase Order. The KPI's will consist of, but are not limited to, the following.
 - Senior management attendance at the site to promote safe work practices, including completing a site job safety observation (JSO).
 - Completion of at least four (4) site JSO's every period by site supervisory staff
 - Suitability of and compliance with SWMS / JSEA's via JSO's (by The Company Representatives)
 - Compliance with Company incident reporting procedure (including near-miss incidents)

Principal Contractor Appointment

- Where the scope of works is considered significant and/or exceeds \$250,000 in value, an assessment is required to determine if the contractor should be appointed as the Principal Contractor.
- Appointing a Principal Contractor involves the transfer of the management, control and conduct of all work activities to the contractor within a specific geographical area. The transfer of control of a specific work area also transfers the legal obligation under the relevant Work Health & Safety legislation to the contractor for all activities within the assigned area.
- When undertaking the assessment to appoint a Principal Contractor, the following needs to be considered.
 - There can only be one Principal Contractor at any given time (e.g., a Contractor or the Company).
 - The transferred area must be clearly delineated from other operational / guest areas or surrounding work activities.
 - Company personnel will only be permitted access to the transferred area with permission from the contractor and will be required to follow the contractor's management system requirements.

- Regular consultation and co-operation are required between the contractor and the Company if the Company engages other contractors or workers to undertake work activities within the transferred area.
- When the assessment determines that a Principal Contractor is to be appointed, the Principal Contractor Appointment template must be completed and signed by the Company and the contractor to formalise the transfer of control and accountability.
- **Principal Contractor Appointment**
- Note: By default, the Person Conducting a Business or Undertaking, known as a PCBU, that commissions construction work valued at \$250,000 or more is the Principal Contractor unless they appoint another PCBU as the Principal Contractor. This means the Company is the Principal Contractor of the construction project unless another PCBU is formally appointed.

Award Contract

- For any scope of work greater than \$10,000 in value or where the service is re-occurring (e.g. ongoing maintenance or as required repairs/services), a formal contract must be developed and signed by both parties (the Company and Contractor).
- Each contract must include the scope of work and the expected standard of work to be provided. It is essential to list all contractor expectations as agreed in the tender/quoting process. The Company approved service provider contract templates can be accessed via the Company SharePoint.

Contractor Online Induction

- Each contractor employee or subcontractor must complete the Online Induction – Safety Culture and assessment before arriving on-site for the first time.
- Upon completing the contractor registration process, they will be provided a link to share with their employees/subcontractors.

Commencement of Work

- Before any contractor commencing work on a Company controlled site, all contractor personnel and subcontractor personnel must sign in at the site reception/office and complete a site-specific induction
- This induction will involve the completion of the Site Induction Register – Contractor, which includes a site familiarisation to show the contractor key areas of the site and any known hazards the contractor needs to be aware of
 - o THF-E-006 Contractor Site Induction Checklist (Development Contractor)
 - o THF-E-006 Park Contractor Site Induction Checklist (Operations Contractor)
- The site-specific induction is also to ensure the contractor is made aware of the work area delineation requirements to separate their work area from accidental access by Company personnel, residents and/or members of the public
- Before commencing work on-site, the minimum documentation requirements that need to be sighted by The Company Contract Owner or delegate includes:
 - o Trade and/or High-Risk Licenses (where applicable) for the workers who have been inducted
 - o Safe Work Method Statements (SWMS) for any high-risk construction activities
 - o Job Safety Environmental Analysis (JSEA) (or similar) for the task/activity to be performed by the contractor
 - o EHS Induction certificates for each worker
- The Contract Owner is also responsible for conducting a Pre-Start meeting with the contractor and their workforce to clearly explain and reiterate the Company expectations. These expectations include, but are not limited to:
 - o On-site behaviour & language
 - o Site access, restrictions & vehicle parking
 - o Restrictions on smoking, drugs & alcohol
 - o Site H&S rules (as per Park or Project rules)
 - o Interaction with residents and members of the public
- Minutes of the contractor Pre-Start meeting need to be recorded, signed by all parties, and filed – these will be periodically requested from the Company for review

Monitor and Review

- On-site activities performed by contractors must be regularly monitored by the Company and recorded via workplace inspections and Job Safety Observations (JSO). The JSO intends to verify the following:
 - o Confirms a JSEA or SWMS is available for the task being conducted
 - o The JSEA / SWMS is specific to the task and work location
 - has it identified all foreseeable hazards, and have controls been implemented for each
 - are the controls effective in managing the risks of each hazard
 - has it been communicated to the workers conducting the task
 - o Communicates with the workers performing the job of any additional hazards that have been identified and controls that should be considered
- These monitoring processes will be conducted by Contract Owners, Site Managers and Supervisors
- Contractor KPI's (where specified) are to be assessed monthly by the Contract Owner. Formal feedback is to be provided by completing the Contractor KPI Report at the following Contract review meeting. Ongoing poor performance by the contractor is to be raised to the Operations Manager, Development/Project Manager as required.
 - o Contractor KPI Form
- Contractor H&S management systems will be reviewed within one-month post-project start-up and audited at least once every six months for contractors carrying out high-risk activities and annually for all other contractors.
- For longer-term Operational and Development contractors, H&S performance criteria will be included in each contract, agreement or other arrangements. This will include, but is not limited to, the following:
 - o Compliance with the Incident Management reporting timeframes
 - o Contractor senior management involvement in on-site inspections and safety observations
 - o Compliance with the Project H&S Rules
 - o The ratio of damage and non-damage related incidents (reporting culture)
- The H&S performance of each contractor will be evaluated and communicated during and at the end of their involvement with the Project
- Contract Owners must review all registered contractors to ensure all insurance and licenses (that have expiry dates) are current - automated notifications will also be sent from the EHS System.

Contractor Administration Maintenance

- Each registered and approved contractor is responsible for updating and maintaining their company information.
- Each contractor must update all relevant license and insurance certificates before expiry dates and ensure their company registration (ABN, GST, etc.) and contact details are still correct
- The contractor will receive automated email notifications from the online platform, Safety Culture, when due expiry dates
- Each registered contractor will have continued access to their profile in the online platform, Safety Culture, whilst engaged by the Company.

Requirements of Contractors Subcontractors

- All contractors who engage subcontractors to support them in the delivery of their scope of work will be required to meet all Company requirements
- It is the contractors responsibility to ensure all subcontractors engaged on a Company site have current insurances, relevant licenses and are supervised by the contractor while conducting work on site
- The contractor is to ensure that all engaged subcontractors have been through the EHS Contractor Induction process
- Subcontractors will be included in all Company workplace monitoring processes to ensure compliance to site requirements and expectations
- The contracting company must ensure that all of their employees and/or sub-contractors have undertaken a local site induction before the commencement of any works

Environment, Health and Safety Control Standard

- The Health Safety Environment Control Standard provides a collation of EHS risk control requirements
- Each control stands independently and must be used to set the minimum requirements to manage each specified risk
- These risk controls have been developed from the outcomes of the Company's H&S risk assessment processes to address EHS risks identified as 'High' or 'Extreme' risks that require specific control measures to manage the risk to an acceptable level
- The intention of the Risk Control Standard:
 - Set the minimum Company requirements and performance outcomes for the Business
 - Developed with a whole-of-business, high-level approach and are not specific to each Business Department
 - Apply a risk-based approach to managing identified High and Extreme hazards applicable across the business using the Hierarchy of Hazard Controls in managing EHS risks and hazards
 - Have cross-reference industry best practices, codes of practice, legislation and standards, which must be considered when managing high and extreme risks
 - Refer THP-E-007 Environmental Health and Safety Control Standard

Contractors Insurance Requirements

- All Company engaged contractors must have provided evidence in the form of a Certificate of Currency of the following insurances.
 - Workers Compensation in accordance with the Workers Compensation Act OR personal injury insurance for sole traders
 - Public / Products Liability for a minimum sum of \$20 million for any one incident
 - The certificates of currency need to be provided by the actual insurer, not the contractor's insurance broker
- In addition to the above requirements, all cabin builders and civil works contractors who are engaged to undertake major works (\geq \$100,000) are required to obtain the following certificates of currency:
 - Company to be listed on the certificate as the "principle" or as a minimum, an "interested party."
 - All liability coverage – \$20 million min
 - Professional Indemnity – \$1 million min
 - Annual Contract Works/Construction insurance – \$500,000 min limit for anyone contract, plus defect/maintenance period 12 months
 - Marine Cargo Insurance - \$500,000 min limit anyone conveyance
- Sole Trader required insurances: -
 - The Supplier must effect the following insurances with a reputable insurance company licensed to carry on business in Australia prior to commencing the works, and must maintain the insurance for the duration of the works:
 - All insurances required by law.
 - Without limiting condition 9.1(a), statutory workers compensation insurance for any employees or contractors who are required by law to be insured.
 - In the event the Supplier is a sole trader, director, partner of a partnership or trustee, an accident insurance policy providing compensation for lost wages, reasonable medical and rehabilitation costs and death benefits.
 - Public liability insurance for not less than:
 - \$20 million per claim in the case the Supplier is a Principal Contractor; and
 - \$10 million per claim in the case of all other suppliers; and
 - Professional indemnity insurance for not less than:
 - \$20 million per claim in the case the Supplier is a Principal Contractor; and
 - \$10 million per claim in the case of all other suppliers.