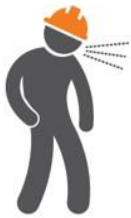


Built

Preventing Violence & Injury in the Workplace



STAY AT HOME IF SICK



KEEP YOUR DISTANCE
1.5 METERS OR TWO ARMS LENGTH



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Introduction

The building and construction industry is a high risk, high stress workplace which can result in injury or antisocial behaviour.

This booklet has been developed to educate our workforce on Built policies and standards of behaviour, that apply to all workers on site, to prevent violence and injury, harassment, bullying or discrimination in the workplace. It also covers the plans and procedures to prevent work related injury or illnesses.

Research has uncovered cases of bullying culture within the construction industry, directed particularly toward apprentices and those new to the industry. Young Australian males working in the construction industry are twice as likely to take their own lives than other young Australian males. This group is also at high risk for poor mental health and alcohol and other drug related harm. The outcomes from this research have informed our policies and procedures, allowing us to put in place evidence-based interventions to address bullying and mental health.

Additionally, injury is a big risk for construction workers - around 12,600 workers' compensation claims are accepted from the construction industry each year for injuries and diseases requiring one or more weeks off work - this equates to 35 serious claims each day.

Built have numerous policies, plans and procedures in place to ensure everyone is safe and respected on site.

Built Anti-Discrimination, Bullying & Harassment EEO Policy

Introduction

Built Pty Ltd ('Built') aims to provide an environment where employees and others in the workplace are treated fairly and with respect, and are free from unlawful discrimination, harassment and vilification.

Built aims to ensure that when employment decisions are made, they are based on merit, not on attributes or characteristics that an individual may possess.

Purpose

To affirm Built's commitment to providing and maintaining a healthy and safe environment that is free from discrimination, bullying, and harassment this policy outlines what constitutes discriminatory, bullying and harassing behaviours as well as the potential consequences of breaching this policy.

Commencement of Policy

This Policy will commence from 1 December 2020. It replaces all other Anti-Discrimination & Equal Employment Opportunity Policies (whether written or not).

Application of Policy

This Policy applies to job candidates, employees, agents and contractors (including temporary contractors) of Built, collectively referred to in this Policy as 'workplace participants'.

This Policy is not limited to the workplace or work hours. In accordance with Australia's Equal Opportunity Laws, this Policy extends to all functions and places that are work related for example, work lunches, conferences, Christmas parties and client functions as well as the provision of goods and services.

Equal Employment Opportunity laws

Under EEO laws, discrimination, vilification, harassment, bullying and victimisation are unlawful and strictly prohibited.

Direct discrimination

Direct discrimination in employment occurs when a person is treated less favourably than another in their employment because of a reason or ground which is prohibited by law. The prohibited grounds of discrimination are set out in the Federal, State and Territory anti-discrimination laws and include sex, race, age etc. A full list of the grounds of discrimination which operate federally and in the State and/or Territories in which workplace participants undertake their work for Built may be relevant and are listed below.

- Race (including colour, nationality, descent, ethnic, ethno-religious or national origin)
- Religious belief, affiliation, conviction or activity
- Sex
- Marital status, domestic status, relationship status
- Pregnancy (including potential pregnancy)
- Homosexuality, transsexuality and transgender status, sexuality, sexual preference/orientation, lawful sexual activity, gender identity, intersex status

- Accommodation status (ACT only)
- Identity of a spouse or domestic partner (SA only)
- Genetic information (ACT only)
- An expunged homosexual conviction (VIC only)
- Person's details being published under relevant Fines and Penalties Acts (NT and WA only)
- Records of a person's sex having being altered under Births, Deaths and Marriages Registration Act 1997 (ACT only)
- Carers' responsibilities, family responsibilities, carer or parental status, being childless
- Disability/impairment, including physical, mental and intellectual disability
- Breastfeeding Age (including compulsory retirement)
- Physical features (ACT and VIC only)
- Profession, trade, occupation or calling (ACT only)
- Immigration status (ACT only)
- Employment status (ACT only)
- Industrial/trade union membership, non-membership or activity Political belief, opinion, affiliation, conviction or activity
- Employer association membership, non-membership or activity
- Irrelevant criminal record (ACT, NT and TAS only)
- Employment activity (VIC only)
- Irrelevant medical record (NT and TAS only)
- HIV/AIDS
- Defence service
- Association (i.e. association with a person who has one or more of the attributes for which discrimination is prohibited)
- Religious appearance or dress (in work or study) (SA only)
- Gender history (WA only)
- Association with a child (in customer service) (SA only)
- Subjection to domestic or family violence (ACT only)
- Spent convictions (WA only)
- Kinship responsibilities (ACT only)

Indirect discrimination

Indirect discrimination may occur when an employer imposes a policy, requirement or condition which applies to everyone equally, but it in fact operates to disadvantage a particular group because of a characteristic of that group, such as their sex, age, race (i.e. a prohibited ground of discrimination).

Bullying

Workplace bullying is repeated, unreasonable behaviour by an individual or group of individuals, directed towards a worker or a group of workers that creates a risk to health and safety. It includes both physical and psychological risks and abuse.

'Repeated behaviour' refers to the persistent nature of behaviour and can refer to a range or pattern of behaviours over a period of time (for example, verbal abuse, unreasonable criticism, isolation and subsequently being denied opportunities — i.e. a pattern is being established from a series of events).

'Unreasonable behaviour' means behaviour that a reasonable person, having regard to all the circumstances, would view as unreasonable in the circumstances and may result in that employee feeling victimised, humiliated, undermined or threatened by that behaviour, regardless of what the intention of the behaviour is.

Examples of workplace bullying

Bullying behaviours can take many different forms, from the obvious (direct) to the more subtle (indirect). The following are some examples of both direct and indirect bullying.

Direct bullying:

- abusive, insulting or offensive language or comments
- spreading misinformation or malicious rumours
- behaviour or language that frightens, humiliates, belittles or degrades, including over criticising, or criticism that is delivered with yelling or screaming
- displaying offensive material
- inappropriate comments about a person's appearance, lifestyle, family, sexual preferences or any personal or private matter
- teasing or regularly making someone the focus of pranks or practical jokes
- interfering with a person's personal property or work equipment, or
- harmful or offensive initiation practices.

Indirect Bullying:

- unreasonably overloading a person with work, or not providing enough work
- setting timeframes that are difficult to achieve, or constantly changing them
- setting tasks that are unreasonably below, or above, a person's skill level
- deliberately excluding or isolating a person from normal work activities
- withholding information that is necessary for effective performance of the person's job
- deliberately denying access to resources or workplace benefit and entitlements, for example training, leave etc.
- deliberately changing work arrangements, such as rosters and leave, to inconvenience a particular worker or workers

The above examples do not represent a complete list of bullying behaviours. They are indicative of the type of behaviours which may constitute bullying and therefore are unacceptable to Built.

A single incident of unreasonable behaviour does not usually constitute bullying. However, it should not be ignored as it may have the potential to escalate into bullying behaviour.

A person's intention is irrelevant when determining if bullying has occurred. Bullying can occur unintentionally, where actions which are not intended to victimise, humiliate, undermine or threaten a person actually have that effect.

Bullying in the workplace is harmful not only to the target of the behaviour but damages Built's culture and reputation. It is unacceptable and will not be tolerated.

What does not constitute workplace bullying?

Managing workplace participants does not constitute bullying, if it is done in a reasonable manner. Managers have the right, and are obliged to, manage workplace participants. This includes directing the way in which work is performed, undertaking performance reviews and providing feedback (even if negative) and disciplining and counselling staff.

Examples of reasonable management practices include:

- setting reasonable performance goals, standards and deadlines in consultation with workers and after considering their respective skills and experience
- allocating work fairly
- rostering and allocating working hours in a fair and reasonable manner
- transferring a workplace participant for legitimate and explained operational reasons
- deciding not to select a workplace participant for promotion, following a fair and documented process
- informing a workplace participant about unsatisfactory work performance in a constructive way and in accordance with any workplace policies or agreements
- informing a workplace participant about inappropriate behaviour in an objective and confidential way
- implementing organisational changes or restructuring, and
- conducting performance management processes.

Harassment

Harassment is a form of discrimination and may also be unlawful if based on particular grounds. It can take many forms including verbal, physical, written or pictorial.

Harassment is conduct that:

- is unwelcome or unwanted
- causes offence, intimidation or humiliation. The perception of whether or not the behaviour is threatening or harassing lies with the receiver
- occurs in circumstances where a reasonable person would have anticipated that the person harassed would be offended, humiliated or intimidated.

Sexual Harassment

Sexual harassment is unwelcome conduct of a sexual nature, which makes a person feel offended, humiliated or intimidated. Conduct can amount to sexual harassment even if the person did not intend to offend, humiliate or intimidate the other person. However, conduct will not be sexual harassment if a reasonable person, having regard to all the circumstances, would not have anticipated that the conduct would offend, humiliate or intimidate the other person. Sexual harassment does not have to be directed at a particular individual to be unlawful. Behaviour which creates a hostile working environment for other workplace participants can also be unlawful.

Examples of sexual harassment include, but are not limited to:

- physical contact such as pinching, touching, grabbing, kissing or hugging
- staring or leering at a person or at parts of their body
- sexual jokes or comments
- requests for sexual favours
- persistent requests to go out, where they are refused
- sexually explicit conversations
- displays of offensive material such as posters, screen savers, internet material etc
- accessing or downloading sexually explicit material from the internet
- suggestive comments about a person's body or appearance
- sending rude or offensive emails, attachments or text messages.

Victimisation

Victimisation is where a person is retaliated against or subjected to a detriment because they have lodged a complaint, they intend to lodge a complaint or they are involved in a complaint of unlawful conduct. Workplace participants must not retaliate against a person who raises a complaint or subject them to any detriment.

Vilification

Vilification is a public act which incites hatred, severe contempt or severe ridicule of a person or group, because of race, homosexuality, transgender, transsexuality or HIV/AIDS.

Rights and responsibilities

All workplace participants must:

- understand and comply with this Policy;
- ensure they do not engage in any unlawful conduct towards other workplace participants, customers/clients or others with whom they come into contact through work;
- ensure they do not aid, abet or encourage other persons to engage in unlawful conduct;
- follow the complaint procedure in this Policy if they experience any unlawful conduct;
- report any unlawful conduct they see occurring to others in the workplace in accordance with the complaint procedure in this Policy; and
- maintain confidentiality if they are involved in the complaint procedure.
- Workplace participants should be aware that they can be held legally responsible for their unlawful conduct.
- Workplace participants, who aid, abet or encourage other persons to engage in unlawful conduct, can also be legally liable.

Breach of this Policy

All workplace participants are required to comply with this Policy at all times. If an employee breaches this Policy, they may be subject to disciplinary action. In serious cases this may include termination of employment. Agents and contractors (including temporary contractors) who are found to have breached this Policy may have their contracts with Built terminated or not renewed.

If a person makes an unfounded complaint or a false complaint in bad faith (e.g. making up a complaint to get someone else in trouble or making a complaint where there is no foundation for the complaint), that person may be disciplined and may be exposed to a defamation claim.

Complaint handling procedure

If a workplace participant feels that they have been subjected to any form of unlawful conduct contrary to EEO laws or this Policy, they should not ignore it. Built has a complaint procedure for dealing with these issues. The complaint procedure has numerous options available to suit the particular circumstances of each individual situation. The manner in which a complaint will be handled is solely at the discretion of the relevant Built's Complaints Officers. The Complaints Officers are Director, People and Culture and Regional Heads of People and Culture.

Examples of the ways in which a complaint can be dealt with

Confront the issue

If a workplace participant feels comfortable doing so, they should address the issue directly with the person concerned. A workplace participant should identify the offensive behaviour, explain that the behaviour is unwelcome and offensive and ask that the behaviour stop. It may be that the person was not aware that their behaviour was unwelcomed or caused offence.

This is not a compulsory step. If a workplace participant does not feel comfortable confronting the person, or the workplace participant confronts the person and the behaviour continues, the workplace participant should report the issue to the relevant Built Complaints Officer.

If a workplace participant is unsure about how to handle a situation and is also unsure if they want to make a complaint, they should contact an EEO Contact Officer for support and guidance. The EEO Contact Officers can assist workplace participants who are uncertain about their rights. EEO Contact Officers are listed at the end of this Policy.

Report the issue

A workplace participant should report the issue to the Complaints Officer aligned with their region.

The Complaints Officer will aim to deal with the workplace participant's complaint in accordance with this Policy. There are two complaint procedures that can be used: informal and formal (detailed further below). The type of complaint procedure used will be determined by the nature of the complaint that is made.

Informal complaint procedure

Under the informal complaint procedure there is a broad range of options for addressing the complaint. The procedure used to address the issue will depend on the individual circumstances of the case. Possible options include, but are not limited to:

- the Complaints Officer discussing the issue with the person against whom the complaint is made; and/or
- the Complaints Officer facilitating a meeting between the parties in an attempt to resolve the issue and move forward.

The informal complaint procedure is more suited to less serious allegations that if substantiated, might not warrant disciplinary action being taken.

Formal complaint procedure

The formal complaint procedure involves a formal investigation of the complaint. Formal investigations may be conducted by a Complaints Officer or a person from outside Built, appointed by Built.

An investigation generally involves, collecting information about the complaint and then making a finding based on the available information as to whether or not the alleged behaviour occurred. Once a finding is made, the Complaints Officer or the external investigator will make recommendations about resolving the complaint.

If Built considers it appropriate for the safe and efficient conduct of an investigation, workplace participants may be required not to report for work during the period of an investigation. Built may also provide alternative duties or work during the investigation period. Generally, employees will be paid their normal pay during any such period.

Confidentiality

The Complaints Officer will endeavour to maintain confidentiality as far as possible. However, it may be necessary to speak with other workplace participants in order to determine what happened, to afford fairness to those against whom the complaint has been made and to assist with resolving the complaint. If a complaint is raised and it appears that unlawful conduct has potentially occurred, Built will endeavour to take appropriate action in relation to the complaint.

All workplace participants involved in the complaint must also maintain confidentiality, including the workplace participant who lodges the complaint. Spreading rumours or gossip may expose workplace participants to a defamation claim. Workplace participants may discuss the complaint with a designated support person or representative (who is not a workplace participant employed or engaged by Built). However, the support person or representative must also maintain confidentiality.

Possible outcomes

The possible outcomes will depend on the nature of the complaint and the procedure followed to address the complaint. Where an investigation results in a finding that a person has engaged in unlawful conduct or breached this Policy, that person may be disciplined. The type and severity of disciplinary action will depend on the nature of the complaint and other relevant factors. Where the investigation results in a finding that the person complained against has engaged in serious misconduct, this may result in instant dismissal. Any disciplinary action is a confidential matter between the affected workplace participant and Built.

Agents and contractors (including temporary contractors) who are found to have engaged in unlawful conduct and/or breached this Policy may have their contracts with Built terminated or not renewed.

Built may take a range of other non-disciplinary outcomes to resolve a complaint, depending on the particular circumstances. Examples include, but are not limited to:

- training to assist in addressing the problems underpinning the complaint;
- monitoring to ensure that there are no further problems;
- implementing a new policy;
- requiring an apology or an undertaking that certain behaviour stop; and/or
- changing work arrangements.

Questions

If a workplace participant is unsure about any matter covered by this Policy, a workplace participant should seek the assistance of Regional Heads of People and Culture.

Variations

Built reserves the right to vary, replace or terminate this policy from time to time.

Built Code of Conduct Policy

Introduction

The purpose of this policy is to provide employees with guidance on the standards of behaviour expected of them in performing their duties of employment ensuring that their conduct is at all times deemed legal and ethical.

The policy provides a general framework of principles to be adopted by employees with respect to their conduct while employed by Built. The policy is not intended to address specific situations that may arise with respect to what is acceptable and unacceptable behaviour.

The standards of conduct required to be met under the policy exist alongside the performance required of employees under their contract of employment, industrial agreements and any other ethical or professional policy of conduct that may bind an employee of Built.

The Managing Director may alter the policy at any time. Employees must observe the policy as amended from time to time.

Scope

This policy applies to employees, contractors, consultants, temporaries, and other workers at Built including all personnel affiliated with third parties.

General rules guiding employees conduct

All employees have a responsibility to:

- respect and uphold the reputation of Built
- treat other employees and those individuals within the wider Built community with fairness, courtesy, respect and without discrimination
- act honestly and avoid the intent and appearance of unethical or compromising practices
- disclose any conflict of interests regarding their position with Built
- carry out their duties in a professional, responsible and diligent manner

Standards to be observed in performing duties

In performing their duties of employment, employees are expected to observe the following obligations:

- be familiar with and observe Built's policies, regulations, rules, in particular the Safety, Limits of Authority and Anti-Discrimination, Bullying and Harassment EEO policies
- observe and comply with all the laws of the State and Commonwealth
- avoid behaviour that is or could reasonably be perceived as harassment, intimidation, discrimination, bullying or threatening in any way
- avoid conflict of interest situations, that is, situations where an employee's personal interests conflict (or appear to conflict) with those of Built. Where the potential for conflict cannot be avoided, employees should take steps to appropriately disclose that interest to their General Manager
- not engage in any corrupt or scandalous conduct
- not induce or facilitate another person to engage in any form of corrupt or scandalous conduct
- carry out their duties of employment conscientiously
- not disclose and take reasonable steps to protect confidential information or information that is disclosed for a specified reason, in particular:

1. any information pertaining to the operations of Built which are unique to it or provide it with a competitive advantage; or
 2. any information relating to employees, clients, contractors, suppliers and any other parties with whom Built conducts business.
- use Built facilities, resources and information in a proper manner including company property, time, proprietary information, corporate funds and work equipment
 - demonstrate fair competition by:
 1. not intentionally misleading client, business partners, competitors or the community
 2. meeting Built's legal and regulatory obligations
 3. informing and supporting Built decisions and actions
 4. Not accepting or offering anything of value such as money or gifts to or from any person who conducts business with Built if it is perceived that the giving or receiving may result in a personal or company gain which is greater than the value of the gift

Addressing a possible breach of the policy

Built will not tolerate any wrongdoing or impropriety at anytime. Built will take the appropriate measures act quickly in correcting the issue if the ethical policy is broken. Any infractions of this policy will not be tolerated.

To promote and maintain the standards of conduct expected of Built, it is important that any employee who has a concern about the conduct of another employee is able to raise their concern freely and without fear of intimidation or repercussion.

To encourage employees to come forward with any concern, Built will:

- consider all policy breach complaints seriously
- investigate, where appropriate, formal complaints immediately
- take all reasonable steps to ensure any employee who makes a complaint in good faith is protected against any disadvantage, victimisation or discrimination because he or she reported a breach of the Policy
- follow the appropriate procedures

In most instances, complaints concerning allegations of conduct that may breach the policy will be dealt with by the process outlined in the [Anti-Discrimination, Bullying and Harassment EEO Policy](#).

If, upon investigation, those responsible for conducting the investigation form the opinion that the complaint is untrue, frivolous or made maliciously or with intent to harm the employee against whom the complaint was made or for some other reason was not made in good faith, the complaint itself may give rise to a breach of the policy by the employee who made the complaint. Built may initiate disciplinary action against any employee responsible for making the untrue, frivolous, malicious or harmful complaint.

Procedure for making a complaint about a breach of the policy

Where an employee witnesses or becomes aware of conduct which, in the employee's view, gives rise to a breach of the policy, the employee should follow the following steps:

1. if appropriate, the employee should attempt to resolve their concern in accordance with the Informal Procedure set out in Built's Equal Employment Opportunity Policy; and
2. where the Informal Procedure referred to in 1) above is not appropriate or was unsuccessful, the employee should attempt to resolve their concern by commencing the Formal Procedure in Built's [Anti-Discrimination, Bullying and Harassment EEO Policy](#).

If an employee is unsure of how to proceed with a complaint or which procedure to follow, they should discuss their concern with their immediate manager or the next most senior staff member in the line of management responsibility.

Guidance and Notes on Some Specific Areas of the Policy

Introduction

It is important for employees to be aware that where they have concerns about what is acceptable or unacceptable behaviour and cannot identify or resolve their concerns by application of the standards outlined in the policy, the employee should always consult their immediate manager for assistance.

Conflict of Interest

The potential for a conflict of interest arises when an employee is placed in a situation where their private or personal interests conflict or appear to conflict with the employee's obligations to Built. Put simply, conflict of interest arises where some external interest of an employee may influence a decision made by, or conduct of, an employee in performing their duties of employment. The policy requires employees to avoid situations that give rise to a conflict of interest or the appearance of a conflict of interest. Where a situation arises that could give rise to a conflict of interest or the appearance of a conflict of interest, an employee must:

- refrain from taking part in any further conduct, discussion or decision-making that might be associated with the matter
- disclose the actual, potential or apparent conflict of interest to their Senior Staff Member immediately.

Examples of situations which may give rise to a conflict of interest include:

- where an employee, their family or someone with whom they have a personal relationship receive some financial interest or other benefit as a result of performing their duties or undertaking work outside their employment duties
- accepting, soliciting or encouraging gifts or benefits by any third party in connection with the performance of their duties
- engaging in outside consultancy work that may compromise either the integrity of the employee or Built
- expressing any public or private point of view where that view may become public, when those views may be seen to be attributed to Built or harmful to Built

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- accepting, soliciting or encouraging gifts or benefits by any third party in connection with the performance of their duties
- engaging in outside consultancy work that may compromise either the integrity of the employee or Built
- expressing any public or private point of view where that view may become public, when those views may be seen to be attributed to Built or harmful to Built

Harassment, Discrimination and Bullying

Every employee is entitled to work in an environment free from harassment, bullying or discrimination. The policy expects that all employees will treat other employees and members of the wider Built community equally and ethically, with courtesy and fairness. Built will not accept behaviour by employees that could be considered:

- offensive, humiliating, intimidating, bullying, or construed as harassment or discrimination on the basis of race, colour, sex, sexual preference, age, physical or mental disability, marital status, family responsibilities, pregnancy, religion, political opinion, national extraction or social origin; or
- unfairly causing harm to the reputation and career prospects of other employees.

Confidentiality of Information

Employees are required to respect others' rights to privacy and must maintain the integrity, confidentiality and privacy of any information concerning other employees provided to them in the course of their employment. Accessing, collecting or disclosing confidential information is only allowed where that disclosure is authorised by an appropriate officer of Built or required by law.

Employees should be aware that the obligations placed on them not to disclose confidential information continue to apply to them following the termination of their employment with Built.

Built Whistleblower Policy



Whistleblower Policy

1. Purpose

The purpose of this policy is to

- state how Built Group Holdings Pty Ltd and its related companies (Built) will manage and investigate Whistleblower disclosures;
- help deter wrongdoing;
- ensure that individuals who disclose wrongdoing can do so safely, securely, and will be protected and supported;
- encourage individuals who have reasonable grounds to suspect wrongdoing to have the confidence to speak up;
- help Built to identify wrongdoing that may not be uncovered unless there is a safe and secure means of disclosing it;

2. Eligible Whistleblower

An Eligible Whistleblower:

- is a current or former:
 - Officer or employee of Built,
 - Individual who supplies goods or services to Built;
 - Employee of an entity who supplies goods or services to Built;
 - Individual who is an associate of Built;
 - A spouse or child of any of the above individuals; or
 - A dependent of any of the above individuals or of such an individual's spouse.

3. Protected Disclosures

A Protected Disclosure qualifies for legal protection under the Corporations Act.

A disclosure of information in relation to Built is a Protected Disclosure if the discloser is an Eligible Whistleblower and:

- the disclosure is of information relating to a Disclosable Matter and is made directly to an Eligible Recipient or to the Australian Securities and Investments Commission (ASIC), The Australian Prudential Regulation Authority (APRA), or another Commonwealth body prescribed by regulation;
- the disclosure to a legal practitioner for the purpose of obtaining legal advice or legal representation about the operation of the whistleblower protections in the Corporations Act; or
- the disclosure is a Public Interest Disclosure or an Emergency Disclosure.

4. Disclosable Matters

4.1 What can be disclosed?

The following are Disclosable Matters:

- (a) Information which the discloser has reasonable grounds to suspect concerns misconduct, or an improper state of affairs or circumstances, in relation to Built;
- (b) Information which the discloser has reasonable grounds to suspect indicates that Built or an officer or employee of Built has engaged in conduct that:

- constitutes an offence against, or a contravention of any of the following:
 - the Corporations Act 2001;
 - the ASIC Act;
 - the Banking Act 1959;
 - the Financial Sector (Collection of Data) Act 2001;
 - the Insurance Act 1973;
 - the Life Insurance Act 1995;
 - the National Consumer Credit Protection Act 2009;
 - the Superannuation Industry (Supervision) Act 1993;
 - an instrument made under any of the Acts listed above;
- constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more; or
- represents a danger to the public or the financial system.

A Protected Disclosure may involve an allegation that there has been a contravention of the law; however, the definition of Disclosable Matters is not restricted to conduct which is a contravention of the law.

Examples of Disclosable Matters

- fraud, money laundering or misappropriation of funds;
- offering or accepting a bribe;
- illegal conduct such as theft, drug offences, violence against the person, criminal damage to property;
- engaging in (or threatening to engage in) detrimental conduct in relation to a person who is a whistleblower or who is believed or suspected to be planning to make a whistleblower disclosure.

4.2 Reasonable grounds to suspect

It is not necessary for a disclosure to be proven to be correct for the disclosure to be a Protected Disclosure. It is only necessary the discloser had reasonable grounds to suspect that the information disclosed relates to a Disclosable Matter.

A discloser will not have reasonable grounds to suspect that a Disclosable Matter exists where the discloser knows that the information to be disclosed is untrue. Deliberate false reporting is strongly discouraged by Built and may result in disciplinary or other appropriate action being taken against the discloser.

4.3 Matters that are not disclosable – personal work related grievances

Disclosures that relate solely to personal work related grievances, and that do not relate to detriment or to the threat of detriment to the discloser, do not qualify for protection under the Corporations Act.

Personal work-related grievances are grievances that relate to the discloser's current or former employment and have, or tend to have, implications for the discloser personally but do not –

- have other significant implications for Built (or another entity); or
- relate to any conduct or alleged conduct about a Disclosable Matter.

Examples of Personal Work Related Grievances

- an interpersonal conflict between the discloser and another employee;
- a decision that does not involve a breach of work place laws;
- a decision about the engagement, transfer or promotion of the discloser;
- a decision about the terms and conditions of engagement of the discloser;
- a decision to suspend or terminate the employment of the discloser or to otherwise discipline the discloser.

A personal work related grievance may still qualify for legal protection if:

- it includes information about misconduct, or

information about misconduct includes or is accompanied by a personal work related grievance;

- Built has breached employment or other laws punishable by an imprisonment for a period of 12 months or more, engaged in conduct that represents a danger to the public, or the disclosure relates to information that suggests misconduct beyond the discloser's personal circumstances;
- The discloser suffers from or is threatened with detriment for making a Protected Disclosure;
- The discloser seeks legal advice or legal representation about the operation of the whistleblower protections in the Corporations Act.

4.4 Disclosure of matters that are not Disclosable Matters

Disclosures that are not about Disclosable Matters do not qualify for legal protection under the Corporations Act. Such disclosures may however be protected under other legislation (such as the Fair Work Act 2009 or the Taxation Administration Act 1953).

5. Eligible Recipients

5.1 Who are they?

An Eligible Recipient is any one of the following persons:

- A director or other officer of Built;
- A senior manager of Built (being a senior executive who makes or participates in the making of decisions which affect the company as a whole);
- An internal or external auditor of Built (including a member of an audit team conducting an audit);
- Deloitte Risk Advisory Pty Limited, the operator of the Built Whistleblower Service.

5.2 How disclosures can be made to Built

Whilst Protected Disclosures can be made to any Eligible Recipient, Built encourages any person wishing to make a disclosure to utilise one of the following means:

- Built Whistleblower Service: Built has established the Built Whistleblower Service operated by Deloitte Risk Advisory Pty Limited. The Built Whistleblower Service is a confidential external platform which enables disclosures to be lodged in a safe and secure manner. You can contact the service by:
 - Australia Freecall: 1800 951 113
 - New Zealand Freecall: 0800 266 579
 - Website: www.builtwhistleblowerservice.deloitte.com.au
 - Email: builtwhistleblowerservice@deloitte.com.au

- Mail: Built Whistleblower Service. Reply paid 12628 A'Beckett Street Victoria 8006

The Built Whistleblower Service provides a convenient means of disclosure for disclosers who wish to remain anonymous.

As an alternative to the Built Whistleblower Service, disclosures can also be lodged:

To either of the following Built officers:

Andrew Lonsdale, General Counsel & Company Secretary:

Telephone: 0423586524

Email: andrewlonsdale@built.com.au

Sarah Wilson, Director People and Culture:

Telephone: 0412140660

Email: sarahwilson@built.com.au

5.3 Anonymous disclosures

Disclosures can be made anonymously. An anonymous disclosure will still qualify for legal protection as a Protected Disclosure if it satisfies the requirements set out in this document.

Anonymous disclosers are encouraged to use the Built Whistleblower Service.

An anonymous discloser may continue to remain anonymous whilst the disclosure is investigated and after it is finalised. A discloser can refuse to answer questions that they feel could reveal their identity at any time, including after the investigation is finalised.

Whilst disclosers are entitled to remain anonymous, anonymity may mean that investigating the disclosure is more difficult. It will assist Built's investigation of an anonymous disclosure if the discloser can provide a means by which Built can contact the discloser without compromising the discloser's anonymity.

6. Public Interest Disclosure

A disclosure may be made to a Federal, State or Territory member of Parliament or a journalist as a Public Interest Disclosure but only in the following circumstances:

- A Protected Disclosure has previously been made to ASIC or APRA (or another Commonwealth body prescribed by regulation);
- At least 90 days have passed and the discloser does not have reasonable grounds to believe that the relevant body is taking action to address the matters to which the disclosure related;
- The discloser has reasonable grounds to believe that a Public Interest Disclosure would be in the Public Interest;
- The discloser has notified the recipient of the original disclosure in writing that it proposes to make a Public Interest Disclosure;
- The extent of information disclosed in the Public Interest Disclosure is no greater than is necessary to inform the MP or journalist of the Disclosable Matter.

Any person considering making a Public Interest Disclosure is strongly encouraged to obtain prior independent legal advice.

7. Emergency Disclosure

A disclosure may be made to a Federal, State or Territory member of Parliament or a journalist as an Emergency Disclosure but only where:

- A Protected Disclosure has previously been made to ASIC or APRA (or another Commonwealth body prescribed by regulation);
- The discloser has reasonable grounds to believe the information concerns a substantial and imminent danger to the health or safety of one or more persons or to the natural environment;
- The discloser has notified the recipient of the original disclosure in writing that it proposes to make an Emergency Disclosure;
- The extent of information disclosed in the Emergency Disclosure is no greater than is necessary to inform the MP or journalist of the substantial and imminent danger.

Any person considering making an Emergency Disclosure is strongly encouraged to obtain prior independent legal advice.

8. Legal protections for disclosers

Identity protection (confidentiality)

8.1 Where Built receives a Protected Disclosure it is prohibited by law from disclosing:

- the identity of the discloser; or
- information that is likely to lead to the identification of the discloser, unless an exception listed below applies.

8.2 The law provides that Built may disclose the identity of the discloser

- to ASIC, APRA or a member of the Australian Federal Police;
- to a legal practitioner for the purpose of obtaining legal advice or representation about the whistleblower provisions in the Corporations Act;
- where the discloser has expressly consented to the disclosure of his or her identity.

8.3 The information contained in a Protected Disclosure can only be disclosed by Built if:

- the information does not include the discloser's identity (unless permitted as set out above);
- Built has taken all reasonable steps to reduce the risk that the discloser will be identified from the information; and
- it is reasonably necessary for investigating the issues raised in the disclosure.

8.4 It is illegal for a person to identify a discloser, or to disclose information which is likely to lead to the identification of a discloser unless one of the above exceptions applies.

Protection from detrimental acts or omissions

8.5 It is illegal for any person to engage in conduct that causes detriment to a discloser (or another Person), in relation to a Protected Disclosure, if:

- the person believed or suspects that the discloser has made, or may make a Protected Disclosure; and
- the belief or suspicion is the reason, or part of the reason, for the conduct.

8.6 In addition, a person cannot make a threat to cause detriment to a discloser (or another person) in relation to a Protected Disclosure. A threat may be express or implied, or conditional or unconditional.

Examples of detrimental conduct:

- Dismissal of an employee;
- Alteration of an employee's position or duties to his or her disadvantage;
- Discrimination between an employee and other employees of the same employer;
- Harassment or intimidation of a person;
- Damage to a person's property;
- Damage to a person's reputation;

8.7 Not all Conduct in relation to a disclosure is detrimental conduct.

Examples of actions that are not detrimental conduct:

- administrative action that is reasonable for the purpose of protecting a discloser from detriment (e.g. moving a discloser who has made a disclosure about their immediate work area to another office to prevent them from detriment); and

-
- managing a discloser's unsatisfactory work performance, or other work related conduct which is not connected to the disclosure

Compensation and other Remedies

8.8 A discloser (or any other employee or person) can seek compensation and other remedies through the courts if they suffer detriment because they make, propose to make (or are suspected of making or proposing to make) a Protected Disclosure; and

8.9 Disclosers who are concerned about these matters are encouraged to seek independent legal advice.

Civil, criminal and administrative protection

8.10 A disclosure is protected from any of the following in relation to their Protected Disclosure

- civil liability (e.g. any legal action against the discloser for breach of an employment contract, duty of confidentiality or another contractual obligation);
- criminal liability (e.g. attempted prosecution of the discloser for unlawfully releasing information, or other use of the disclosure against the discloser in a prosecution (other than for making a false disclosure)); and
- administrative liability (e.g. disciplinary action for making the disclosure).

9. Support and practical protection for disclosers

9.1 Built will take action to support persons who make Protected Disclosures and protect them from detriment.

Identity Protection

9.2 In order to reduce the risk that the discloser will be identified from the information contained in the disclosure

- all personal information or reference to the discloser witnessing an event will be redacted;
- the discloser will be referred to in a gender-neutral context;
- where possible, the discloser will be contacted to help identify certain aspects of their disclosure that could inadvertently identify them; and

9.3 In order to foster secure record keeping and information-sharing processes:

- all paper and electronic documents and other materials relating to disclosures will be stored securely;
- access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the disclosure; and
- each person who is involved in handling and investigating a disclosure will be reminded about the confidentiality requirements, including that an unauthorised disclosure of a discloser's identity may be a criminal offence.

9.4 Disclosers should also be aware that, in practice, people may be able to guess the discloser's identity if:

- the discloser has previously mentioned to other people that they are considering making a disclosure;
- the discloser is one very small number of people with access to the information; or
- the disclosure relates to information that a discloser has previously been told privately and in confidence.

Protection from detrimental acts or omissions

9.5 Disclosures made in accordance with this Policy will be overseen by Built's Disclosure Management Panel (DMP). The DMP will be comprised of the General Counsel & Company Secretary, the Director People & Culture, the Finance Director and the Commercial Director.

9.6 Upon receipt of a disclosure the DMP must consider the risk of detriment against the discloser (and other persons) ensure that appropriate steps are put in place to protect against detriment. What is necessary and appropriate will depend on the circumstances of the case (including whether the identity of the discloser is known to the DMP) but may include:

- allowing the discloser to perform their duties from another location, reassigning the discloser to another role or modifying their duties or reassigning or relocating other staff involved in the disclosure;

- actions to ensure that management are aware of their responsibilities to maintain the confidentiality of a disclosure, address the risks of isolation or harassment, manage conflicts and ensure fairness when taking management action in respect of a discloser;
- intervening where detriment has already occurred or appears imminent to ensure that it does not continue and that any necessary remedial measures are put in place.

9.8 Disclosers who believe that they have suffered detriment can lodge a complaint with Built's Director, People and Culture. Built will investigate such complaints as a separate whistleblower disclosure in accordance with this Policy. A complaint may also be lodged with a relevant regulator.

10. Investigation of disclosures

10.1 Upon receipt of a Disclosure, the recipient will notify the General Counsel & Company Secretary who will convene Built's Disclosure Management Panel. It is the responsibility of the DMP to review disclosures to ensure that they meet the requirements of this policy and to ensure they are appropriately investigated and responded to.

10.2 If a disclosure relates to a member of the DMP that member will not take any part in the DMP's consideration of the disclosure.

10.3 The DMP will:

- determine whether the disclosure satisfies the requirements for a Protected Disclosure;
- determine whether the disclosure warrants investigation, based on the information received,
- assess whether there is potential for the discloser to suffer detriment as a result of having made the disclosure,
- take measures it considers necessary to protect the discloser from detriment, and
- if a disclosure is to be investigated, ensure the discloser, where possible, understands the investigation process.

10.4 The investigation process followed will depend on the nature and circumstances of the disclosure.

Nonetheless, all investigations will follow a process similar to the one described below:

- If the DMP determines that an investigation is warranted, the DMP will ensure that investigation is carried out by internal or external personnel who have the necessary skills, knowledge and independence..
- An employee of Built who is the subject matter of a disclosure will be informed of the subject matter of the investigation and afforded procedural fairness at such time as the DMP determines is appropriate to do so but prior to the conclusion of the investigation..
- The investigator will keep records of all the interviews conducted and all records received which affect the outcome of the investigation.

- Once the investigation is complete, the DMP will submit a report to the Managing Director of Built who will determine what if any, further action is to be taken.
- Where the identity of the discloser is known (or is unknown but a channel of communication is available) the DMP
 - will acknowledge receipt of the disclosure to the discloser as soon as practicable following receipt of the disclosure;
 - will further communicate with the discloser throughout the investigation process at such times as it is appropriate to do so (this may include specific questions or requests for information to assist the investigation or may be a general update on the progress of the investigation if the investigation period is extended);
 - will ensure the Discloser is kept informed of the outcomes of the investigation in a timely manner subject to the considerations of privacy of those against whom the disclosure is made.

11. Availability of Policy

This policy will be made available to potential Eligible Whistleblowers via:

- The Built website (www.built.com.au); and
- The Built Intranet site (Built IQ).

12. Review of policy

This policy will be reviewed every two years to ensure that it continues to comply with the law and remains relevant and effective. This policy was last reviewed on 18 December 2019.



Brett Mason
Managing Director
1 August 2021

Built Work Health & Safety Policy

Built

Work Health & Safety Policy

Our Aim

Built is committed to having an organisational culture which allows safety to thrive and positions our company as the leader in providing safe and healthy workplaces for our employees, subcontractors, stakeholders and the public.

Our Guiding Principles are:

- Safety is a core value and prioritised in our decision making
- Visible and accountable safety leadership is an established expectation on all work sites
- Appropriate and just action is taken when a person disregards health and safety procedures
- Safety management systems are implemented and maintained in order to meet WHS accreditation requirements
- Safety is designed into our work practices in order to eliminate and control hazards
- Incidents are investigated and both corrective actions plus lessons learned are implemented and shared across the organisation
- We comply with all current WHS legislation, codes of practice and industry guidelines
- We are committed to positive engagement with our workforce, subcontractors and stakeholders through safety committees and other consultative processes
- WHS targets are established with the aim of continually improving our safety performance
- Appropriate work health and safety training is made available
- Adequate resources are allocated to support delivery of the WHS strategy



Brett Mason
Managing Director
1 August 2021

Built Drugs & Alcohol Policy

Built

Drugs & Alcohol Policy

Policy

Built aims to provide a work environment which ensures the health and safety of its employees, contractors and consultants while occupying or visiting Built work premises and worksites.

The use of illegal drugs and the misuse of legal drugs, alcohol or other illicit substances can pose a serious risk to an individual's health and safety and may impair a person's capacity to perform work safely. Impairment may also have the potential to cause a threat to the well-being of the individual, other employees, clients of Built as well as members of the public.

The Built Drug & Alcohol Policy (D&A) applies to all Built employees, contractors, sub-contractors and any visitors to any site, building or location owned or operated by Built.

Individuals must not:

- Possess, sell, distribute or consume illegal drugs; or
- Be affected by prescription drugs or alcohol to the extent that it poses a risk to their safety or the safety of others; or
- If tested for drugs and/or alcohol, return a "positive" test result as specified under the Built Drug & Alcohol Management Procedure (DAMP)

These obligations apply to Individuals:

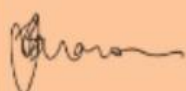
- During work hours
- During work based social events that have been organised by Built and held on Built owned, operated or controlled sites
- When individuals perform services or work for or on behalf of Built
- When individuals visit Built owned, operated or controlled sites

No individual will be permitted to enter or remain on a location to perform work when Built forms an informed view that a person's behaviour may create a risk to their safety or the safety of others.

Contravention of this Policy may result in counselling and disciplinary action in accordance with the Built Code of Conduct and may include termination of employment or contract.

Built endeavours to create a safe working environment by:

- Having an Employee Assistance Programme (EAP) and counselling service to assist employees to overcome any drug or alcohol related problem that could impair safety at work
- Implementing random testing for drugs and alcohol at Built workplaces
- Supporting and appropriately managing people who breach this policy with a just culture with a view to ensuring a safe workplace



Brett Mason
Managing Director
1 August 2021

Built Workplace Injury & Rehabilitation Policy



Workplace Injury & Rehabilitation Policy

Our Aim

Built will take all reasonably practicable steps to provide and maintain safe and healthy work conditions, plant, equipment and systems for all employees, contractors and visitors. This includes the provision of information, instruction, training and supervision for this purpose.

Built is also committed to the process of workplace injury management and rehabilitation should the situation arise where an employee is injured during their employment. Compliance with relevant and current state injury management practices will be maintained including consultation with all parties involved in the process.

We will achieve this by:

- Complying with all applicable laws, regulations and statutory obligations relevant to workplace injury management and rehabilitation
- Providing Built staff with sufficient resources and training that enables them to perform their duties in accordance with all statutory requirements
- Maintaining contact with employees who are ill or injured during the course of their employment
- Wherever possible providing suitable duties where the person is unable to perform their normal duties
- Ensuring that the process commences as soon as possible after the injury or illness in a manner consistent with medical judgment
- Ensuring there is an expectation and normal practice that the provision of suitable duties for an injured or ill employees is an integral part of the rehabilitation process
- Maintaining open lines of communication with all parties involved in the return to work process including appointed Rehabilitation Providers and medical experts
- Confirming that workplace injury management and rehabilitation is a shared responsibility between Built and the injured/ill employee. This information will be conveyed to employees during inductions and site meetings
- Reporting to the Built Board of Directors on workplace injury and rehabilitation performance

A handwritten signature in black ink, appearing to read 'Brett Mason'.

Brett Mason
Managing Director
1 August 2021

Built Clip & Carry Policy

Built

CLIP & CARRY

- Gloves are now required to be clipped and carried on all Built sites
- Anyone undertaking work must have and wear gloves while doing work
- It's important to choose the right glove for your activity
- Use the charts below to identify the right gloves - the higher the number the better protected you are



DID YOU KNOW? 50% of our hand injuries are caused by cuts & lacerations

Use the numbers outlined in the diagram opposite to find the rating.

Blade cut resistance (circular saw):

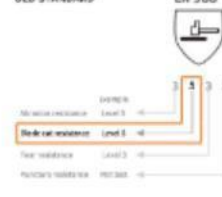
Level 1 (lowest) - 5 (highest)

Cut resistance (Straight blade e.g. Stanley

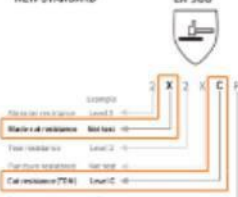
knife): Level A (lowest) - F (highest)



OLD STANDARD



NEW STANDARD



THIS IS A CLIP & CARRY SITE



Gloves must always be
carried on person

Please wear your gloves
when doing work

Built Worthy Site Behaviours

The Built Worthy Site Behaviours is a framework of behaviour which has been developed in collaboration with our subcontractors. These Site Behaviours establish a common platform where everyone on site is treated equally and with respect and in turn everyone shares in the ownership of common goals. It's our unique way of ensuring everyone works together toward better safety and quality outcomes. It is represented through four behaviours:



The Site Behaviours are an extension of what it means to be Built Worthy. The Site Behaviours are simple and describe what we expect of our site culture in a way that is relatable and means something to everyone on site.

As part of the Built Worthy Site Behaviours program, Built run charter workshops on all projects to bring together subcontractors and site teams in the early stages of a project to agree on how they'll work together and achieve common goals. The charter focuses on the four behaviours. A representative from each subcontractor package is invited and encouraged to participate in the workshop to have their say.

Example Project Charter

Our Project Charter 6 & 8 Parramatta Square

Our commitment to all working together

TELL IT LIKE IT IS

- Be honest with everyone
- Don't take it personally
- Raise issues in meetings, not afterwards
- Call each other by first name



SEE IT. CALL IT. FIX IT.

- Speak up if something is unsafe
- Speak up if there's a problem
- Speak up if there's a better way
- Speak up if you make a mistake
- Speak up if someone's not living up to our Charter



PLAN BEFORE YOU ACT

- Plan work & process together
- Be at all meetings on time
- Communicate program & changes quickly
- Plan each day together & commit to it
- Have the right experience for the job
- Enroll everyone in our Charter



WORK TOGETHER. MAKE IT BETTER.

- Treat everyone with respect
- Respect other people's work
- Finish your work on time & to agreed standard
- Take ownership of your rubbish
- Look out for everyone's safety
- Look out for young/inexperienced workers



Participants



Site Safety Hazards & Controls

Working at heights

- Experienced and authorised personnel
- Exclusion Zones
- Compliance with your SWMS



Chemical spills

- All chemicals to be stored in nominated lock up cage.
- Spill kit to be located in close proximity to be utilised in the event of a spill



Dust

- Extraction & suppression equipment to be used
- Appropriate PPE to be used
- Appropriate equipment and tools to be utilised
- MDF cutting rooms to be set up



Mobile Plant

- Experienced and authorised personnel
- Exclusion Zones
- Compliance with your SWMS
- No use of mobile phones
- Spotter to be in place



Falling Objects

- Experienced and authorised personnel
- Exclusion Zones
- Compliance with your SWMS
- Spotter to be in place



Working around live services

- Treat all services as live
- Review HSE-092 prior to commencement of work
- All live services to be tagged
- Only trained and authorised personnel to alter live services when required
- Compliance with your SWMS



COVID-19 Site Safety

- Workers have a duty to take reasonable care for their own health and safety and to not adversely affect the health and safety of others.
- Workers should be reminded to always practice good hygiene and other measures to protect themselves and others against infection.
- Asking whether they have been overseas, in contact with anyone who has the coronavirus, or have flu-like symptoms.

