

# 5 WHS Policy

---

Version Number: 3 Issue Date: February 2026

---

## A Purpose

The purpose of this policy is to define PreBuilt's commitment to workplace health and safety and to establish the governance framework for the Work Health and Safety Management System within the Integrated Management System (IMS).

## B Policy Statement

PreBuilt designs, manufactures and installs prefabricated and modular buildings for residential and commercial applications across Australia. Our operations include construction activities such as work at height, crane and lifting operations, heavy vehicle transport, prefabricated module installation and on-site commissioning—all of which are recognised as high-risk construction activities.

The health, safety and wellbeing of our people, contractors, visitors and the public is fundamental to our business success. Every person has the right to return home safely, and we are committed to making this a reality through systematic risk management and a culture of care.

The management team, led by the Chief Executive Officer, is ultimately accountable for establishing, implementing and maintaining this Work Health and Safety (WHS) policy and the effectiveness of the WHS Management System.

PreBuilt is committed to:

- Providing and maintaining work environments, plant and systems of work that are safe and without health risks, so far as is reasonably practicable, for the prevention of work-related injury and ill health.
- Eliminating hazards at the source so far as is reasonably practicable and, where elimination is not reasonably practicable, reducing WHS risks through systematic hazard identification, formal risk assessment and implementation of controls in accordance with the hierarchy of controls
- Providing adequate resources (financial, human and technical) to implement and maintain effective WHS systems and achieve our WHS objectives
- Protecting workers from reprisal when reporting incidents, hazards, risks and concerns, and ensuring all workers can raise WHS matters without fear, including confidential reporting and escalation pathways where issues are not adequately addressed
- Establishing, implementing and reviewing WHS objectives and targets that are consistent with this policy and with PreBuilt's strategic direction.
- Consulting and engaging with workers, health and safety representatives and contractors on WHS matters and supporting their participation in decision-making affecting their health and safety
- Ensuring contractors and subcontractors engaged by PreBuilt understand and share our commitment to workplace health and safety and comply with our WHS requirements
- Continually improving WHS performance and the effectiveness of the WHS Management System through monitoring, measurement, audit, review and corrective and preventive action

- Complying with applicable work health and safety legislation and maintaining ISO 45001:2018 certification through systematic risk management and operational controls.

## C Scope & Application

This policy applies to:

- All employees of PreBuilt Residential (ABN 76 103 794 743) and PreBuilt Commercial (ABN 45 115 360 524)
- All contractors, subcontractors, labour hire and temporary workers engaged by PreBuilt
- All visitors and other persons at PreBuilt workplaces and worksites
- All PreBuilt activities, including design, manufacturing, construction, transport and installation works.

This policy is communicated to all workers and relevant contractors through induction, training and consultation processes and is available to workers and other interested parties upon request.

## D Legislative and Certification Framework

PreBuilt maintains certification to: ISO 45001:2018 Occupational Health and Safety Management Systems. PreBuilt's Work Health and Safety Management System is designed to comply with all applicable Commonwealth and State work health and safety legislation, regulations, codes of practice and relevant Australian Standards in all jurisdictions in which PreBuilt operates. Including but not limited to:

- Occupational Health and Safety Act 2004 (Vic)
- Occupational Health and Safety Regulations 2017 (Vic)
- Workplace Injury Rehabilitation and Compensation Act 2013 (Vic)
- Work Health and Safety Act 2011 (NSW)
- Work Health and Safety Regulation 2017 (NSW)
- Applicable workers compensation legislation
- National Construction Code (NCC)
- Relevant State and Territory building legislation
- All other applicable legislation, regulations, codes of practice and Australian Standards relevant to prefabricated construction manufacturing, transport and installation activities.

For Victorian operations, references to WHS are taken to mean Occupational Health and Safety (OHS) under the Occupational Health and Safety Act 2004 (Vic).

PreBuilt maintains documented processes to identify, access and periodically evaluate compliance with applicable legal and other requirements. Compliance is reviewed through internal audits, management review processes and operational monitoring to ensure obligations are met across all jurisdictions in which PreBuilt operates.

## E Governance and Responsibilities

PreBuilt's senior leadership team is accountable for the effective implementation of this policy and the performance of the Work Health and Safety Management System. Senior

leadership ensures that WHS is compatible with the organisation's strategic direction and that the WHS policy and objectives are established and implemented.

Senior management will:

- Demonstrate visible leadership and commitment to workplace health and safety through active participation in safety activities, allocation of appropriate resources, and integration of WHS into business planning, risk management and operational decision-making
- Provide and maintain the resources, personnel, safe systems of work, training, supervision and equipment necessary to eliminate or minimise risks so far as reasonably practicable
- Ensure compliance with all applicable WHS legislation, regulations, codes of practice and Australian Standards, and monitor changes to legal and other requirements
- Set, monitor and review WHS objectives, targets and performance indicators as part of the Integrated Management System, with regular reporting to the Executive team
- Review WHS performance and the effectiveness of the WHS Management System through regular management review processes to drive continual improvement.

Managers and supervisors are responsible for:

- Implementing WHS requirements within their areas of control, including ensuring all workers under their supervision are competent, inducted and briefed on site-specific hazards and controls
- Planning and supervising work to ensure it is carried out safely, including conducting pre-start meetings, monitoring compliance with Safe Work Method Statements, and intervening when unsafe conditions or practices are observed
- Consulting meaningfully with workers on WHS matters, facilitating toolbox talks, fostering a culture where all workers feel empowered to report hazards, near misses and incidents without fear, and encouraging active participation in WHS decision-making
- Holding contractors and subcontractors accountable to PreBuilt's WHS standards, ensuring they have the capability and commitment to work safely, and monitoring their compliance with WHS requirements
- Monitoring high-risk construction work including work at height, crane and lifting operations, module transport and installation
- Exercising their authority to stop work when they identify an immediate risk to health and safety.

All workers (including employees, contractors and subcontractors) are expected to:

- Take reasonable care for their own health and safety and that of others who may be affected by their acts or omissions
- Comply with WHS policies, procedures, Safe Work Method Statements (SWMS), Job Safety Analyses (JSAs), Safe Operating Procedures (SOPs) and reasonable lawful instructions
- Participate actively in site inductions, pre-start meetings at each stage of manufacturing and construction (including fabrication, module splitting and moving, crane lifting operations, module installation and trade starts), toolbox talks, training programs and consultation processes

- Report promptly all hazards, near misses, incidents, injuries and unsafe conditions to their supervisor or the HSEQ Advisor, particularly those relating to work at height, crane and lifting operations, module transport and on-site installation activities
- Use and maintain correctly all plant, equipment and personal protective equipment as instructed, and not interfere with or misuse anything provided in the interests of health and safety
- Cooperate in the development and review of safe work procedures and contribute feedback to improve our safety management system.

## F Objectives, Targets and Performance

PreBuilt establishes WHS objectives and targets consistent with business strategic goals. WHS performance is monitored using appropriate leading and lagging indicators and is reviewed through management and WHS governance processes. Key WHS objectives and measurable indicators (including LTIFR, MTIFR, near-miss reporting rates and audit close-out performance) are documented in the IMS Objectives and Targets Register and reviewed at least annually by senior leadership.

## G Consultation and Participation

PreBuilt is committed to consultation and participation of workers and their representatives in accordance with legislative requirements and ISO 45001. Workers are provided reasonable opportunities to express views, contribute to decision-making on WHS matters and are supported in exercising their rights, including the right to cease unsafe work where there is a reasonable concern of serious risk.

Workers are encouraged and supported to contribute to WHS decision-making, including:

- Hazard identification and risk assessment
- Development and review of WHS procedures, safe work method statements and site-specific controls
- Incident and near-miss reporting and investigation
- Continuous improvement of WHS systems, processes and practices.

PreBuilt provides mechanisms for workers and health and safety representatives to be consulted, informed and involved in WHS matters, including toolbox talks, pre-start meetings, WHS committee and HSR meetings, design and risk workshops and issue-resolution processes defined in the IMS.

## H Risk Management Framework

PreBuilt applies a structured risk management approach to identify hazards and eliminate or minimise risks so far as is reasonably practicable. Risk controls are implemented in accordance with the hierarchy of controls and are supported by work management plans, procedures, safe work method statements and site-specific controls documented within operational plans and procedures. Risk assessments are reviewed when changes occur to work activities, plant, substances, personnel or site conditions, or following reported incidents or near misses.

## I Integrated Management System

This policy forms part of PreBuilt's Integrated Management System (IMS), which integrates workplace health and safety, quality and environmental management. It is supported by

procedures, plans and operational controls that define how WHS risks are managed across PreBuilt operations, including site-specific Work Management Plans, Safe Work Method Statements (SWMS), Standard Operating Procedures, Emergency Response Plans, risk registers, training and competency procedures, incident investigation procedures and contractor management procedures.

Contractor and supplier WHS requirements are embedded in procurement, prequalification, contract conditions and performance review processes, including periodic performance reporting and feedback to preferred subcontractors and suppliers.

## J Monitoring, Review and Continuous Improvement

PreBuilt systematically monitors and measures WHS performance through inspections, observations, reporting, audits and formal management review processes to drive continual improvement and ensure the effectiveness of the WHS Management System. The WHS Management System is reviewed periodically, and at least as often as this policy, to ensure continued suitability, adequacy, effectiveness and alignment with organisational activities, risk profile, legislative requirements and ISO 45001:2018 certification.

Continuous improvement is driven through corrective and preventive actions, lessons learned, worker and stakeholder feedback and the adoption of improved practices, technologies and innovations.


## K Policy Review and Approval

This policy is reviewed at least every two years or sooner if significant changes occur to PreBuilt operations, WHS obligations or strategic direction.

### Document revision history

Version	Date	Description of Change	Approved By
1.0	Feb 2020	Policy renamed and updated to align with IMS structure and ISO 45001 certification	Managing Director
2	Oct 2022	Minor updates to responsibilities and review dates	Managing Director
2.1	Aug 2024	Minor updates to responsibilities and review dates	Chief Executive Officer
3	Feb 2026	Policy rewritten for enhanced alignment with ISO 45001 certification	Chief Executive Officer

Approved by:

Signed:   
 Name: Malcolm Batten  
 Position: Chief Executive Officer  
 Date: 6/2/2026  
 Next Review Date: February 2028