

Challenger Limited

Work Health and Safety Policy

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Prepared by: Human Resources
Authorised by: Group Risk Committee

Contents

Why is this policy required?	3
Who does this	3
Policy apply to?	3
Relevant Australian legislation	3
Key Terms.....	3
Review Cycle.....	3
1. Objectives	4
2. Scope.....	4
3. References	4
4. Overall Responsibilities	4
5. Specific Obligations and Accountabilities	4
5.1 Challenger's Responsibilities	4
5.2 Officer Responsibilities	5
5.3 Chief Human Resources Officer	5
5.4 Worker Responsibilities (excluding contractors and sub-contractors)	5
5.5 Contractors and Sub-contractors Responsibilities	6
5.6 Visitors' Responsibilities	6
5.7 WHS Committee Responsibilities.....	6
6. A Safe Work Environment.....	7
6.1 First Aid	7
6.2 Emergency Procedures.....	7
6.3 Hazards in the Workplace	7
7. Incidents and Injuries	9
7.1 Accident and Incident Reporting, Recording and Investigating	9
7.2 Return to Work.....	9
8. Reporting Requirements	9
9. Training and Awareness.....	10
10. Consultation and Communication	10
11. Records and Records Management.....	10
12. WHS Audits.....	10
13. Whistleblower Policy	11
14. Risk Appetite and complying with this Policy	11
15. Point of Contact	11
16. Review Cycle	11

Summary

Why is this policy required?	This policy outlines our Work, Health and Safety obligations which protect the health, safety and well-being of our employees and other people at work.																
Who does this Policy apply to?	This Policy applies to all legal entities, business divisions and support units of Challenger, and any person that carries out work in any capacity for Challenger including employees, and sub-contractors (and each of their employees), employees of a labour hire company, contingent workers, trainees, visitors, students gaining work experience and volunteers whilst in the workplace.																
Relevant Australian legislation	The <i>Work Health and Safety Act 2011</i> (WHS Act) and other relevant legislation sets out the legal obligations relating to work health and safety. Under the WHS Act, a person conducting a business or undertaking must ensure, so far as is reasonably practicable, the health and safety of employees and other workers at work, as well as ensuring other persons are not put at risk from work carried out as part of the conduct of the business or undertaking.																
Key Terms	<table><tr><td>Challenger</td><td>Challenger Limited and its related bodies corporate incorporated within the Commonwealth of Australia.</td></tr><tr><td>GRC</td><td>Challenger Limited Group Risk Committee. The GRC committee convenes four times a year.</td></tr><tr><td>Officer</td><td>Challenger Directors, the CEO, CFO, the Company Secretary and persons that participate in making decisions that affect the whole or a substantial part of the business.</td></tr><tr><td>Board</td><td>The Board of Challenger Limited, being the body of elected or appointed members who jointly oversee the activities of Challenger. Matters regarding WHS are reported to the Board as and when required.</td></tr><tr><td>WHS</td><td>Workplace Health & Safety and includes workplace or occupational health, safety and welfare.</td></tr><tr><td>WHS Committee</td><td>A group of employee representatives who meet on a quarterly basis to consider WHS matters across the business.</td></tr><tr><td>Worker</td><td>Any person that carries out work in any capacity for Challenger, and includes, permanent and maximum term employees, contractors and sub-contractors (and each of their employees), employees of a labour hire company, trainees, students gaining work experience and volunteers.</td></tr><tr><td>Workplace</td><td>Premises, or any other place, where Employees perform work on behalf of Challenger including any land, building or vehicle.</td></tr></table>	Challenger	Challenger Limited and its related bodies corporate incorporated within the Commonwealth of Australia.	GRC	Challenger Limited Group Risk Committee. The GRC committee convenes four times a year.	Officer	Challenger Directors, the CEO, CFO, the Company Secretary and persons that participate in making decisions that affect the whole or a substantial part of the business.	Board	The Board of Challenger Limited, being the body of elected or appointed members who jointly oversee the activities of Challenger. Matters regarding WHS are reported to the Board as and when required.	WHS	Workplace Health & Safety and includes workplace or occupational health, safety and welfare.	WHS Committee	A group of employee representatives who meet on a quarterly basis to consider WHS matters across the business.	Worker	Any person that carries out work in any capacity for Challenger, and includes, permanent and maximum term employees, contractors and sub-contractors (and each of their employees), employees of a labour hire company, trainees, students gaining work experience and volunteers.	Workplace	Premises, or any other place, where Employees perform work on behalf of Challenger including any land, building or vehicle.
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Workplace	Premises, or any other place, where Employees perform work on behalf of Challenger including any land, building or vehicle.																
Review Cycle	This Policy will be reviewed every two years, or as required if there are material changes in either the regulatory framework or business activities.																

1. Objectives

The objective of this policy, and associated work practices and processes, is for Challenger to ensure a safe and healthy work environment for all workers. Maintaining a safe Workplace requires continuous cooperation between Challenger and its Workers. Challenger acknowledges both the moral and legal obligation to protect all Workers and visitors against risks to their health and safety whilst in the Workplace, whereas each Worker is individually responsible to take reasonable care so as not to expose themselves or others to risk of injury in the Workplace.

2. Scope

This Policy applies to all legal entities, business divisions, support units and Workers of Challenger in Australia.

3. References

Supporting documentation is referenced within this policy; the following forms are to be used in accordance with the policy as indicated.

- [Accident or Injury Form](#)
- [Identifying a Risk of Hazard Form](#)
- [Working Remotely Checklist](#)

4. Overall Responsibilities



5. Specific Obligations and Accountabilities

5.1 Challenger's Responsibilities

Challenger is committed to the search, detection, and elimination, so far as is reasonably practicable, of any possible areas of risk to safety.

Challenger understands that everyone in the business, irrespective of position, has an important role to play in avoiding, so far as is reasonably practicable, any person being injured at our workplaces.

To this end, Challenger undertakes to:

- (a) develop and implement effective procedures to systematically identify hazards, assess risks and eliminate or control risks to the lowest level reasonably practicable;
- (b) provide suitable mechanisms to consult and communicate with Workers;
- (c) develop and implement systems of work that are safe and without risk;
- (d) provide Workplaces that are safe and without risk to health;
- (e) provide and maintain plant (machinery, equipment and appliances) and substances appropriate for our work;
- (f) provide adequate information, instruction, training and supervision to employees;
- (g) provide adequate facilities for the welfare of Workers; and
- (h) to support Workers who are experiencing family or domestic violence

5.2 Officer Responsibilities

Each Officer of Challenger has a positive legal obligation to exercise due diligence in relation to WHS. Officers have a responsibility to:

- (a) acquire and keep up to date knowledge of WHS matters;
- (b) understand the nature of Challenger's operations, and any hazards and risks associated with those operations;
- (c) ensure appropriate resources and processes are available to eliminate or minimise risks to health and safety (and ensure that those resources and processes are used) and respond to non-conformance to legal and compliance requirements by ensuring corrective action is implemented in a timely manner and drives continuous improvement;
- (d) ensure Challenger has appropriate processes for receiving, considering and responding (in a timely manner) to the information about incidents, hazards and risks;
- (e) ensure Challenger has appropriate processes for compliance with its duties and obligations under relevant legislation and that the processes are established, communicated and implemented (e.g. in relation to communicating WHS matters to its Workers, reporting notifiable incidents, consulting with Workers, ensuring compliance with notices issued, ensuring the provision of training and instruction); and
- (f) verify the provision of resources and processes referred to in (c) to (e)

5.3 Chief Human Resources Officer

The Chief Human Resources Officer is responsible for reporting relevant WHS matters to the Executive Risk Management Committee (**ERMC**), which in turn reports any relevant items in the Group Risk Committee (**GRC**) report.

5.4 Worker Responsibilities (excluding contractors and sub-contractors)

Workers have a legal responsibility to take reasonable care to not expose themselves or others to risk of injury in the Workplace.

In particular, Workers shall:

- (a) comply with all policies, procedures and other requirements in place to protect health and safety in the Workplace;
- (b) comply with all reasonable directions from managers in relation to WHS issues in the Workplace;
- (c) reiterate legal and Challenger compliance requirements to co-Workers at the time of observing non-compliance and through consultative forums;
- (d) report hazards, incidents and injuries in the Workplace to their manager as soon as reasonably practicable. This includes reporting actual injuries and 'near misses' (that is, where an incident has occurred which had the potential to cause personal injury or damage to company property, even if no injury or damage occurred);
- (e) attend and participate in all mandatory Challenger WHS activities and training (including but not limited to Challenger's online training);
- (f) participate in work health and safety consultation;
- (g) where relevant, acknowledge and meet the requirements of the working remotely checklist when working from home or in locations external to Challenger's premises;
- (h) understand how to use equipment safely, and use all equipment in the correct manner;

- (i) use any personal protective equipment provided by Challenger (where applicable) to protect their safety and ensuring they use this equipment correctly; and
- (j) cooperate with Challenger as required to enable compliance with the law.

5.5 Contractors and Sub-contractors Responsibilities

Contractors incorporating other businesses engaged to carry out contracted works at Challenger shall plan and implement such strategies as are necessary to eliminate or control, so far as reasonably practicable, all unsafe work practices and behaviours by their workers and workers of sub-contractors. Contractors shall comply with requirements prescribed by Challenger including:

- (a) obtain relevant information to carry out their WHS obligations;
- (b) comply with all relevant safety legislation;
- (c) take into account applicable current Codes of Practice, Australian Standards and *WorkCover* guidance material;
- (d) hold all necessary insurances in respect of the work to be undertaken;
- (e) develop and implement safe work or operating procedures tailored to the work being undertaken;
- (f) provide and maintain safe, clean and tidy work environment without risks to health and safety;
- (g) ensure all workers are adequately trained to safely and competently carry out contracted tasks;
- (h) possess all necessary licenses and certificates of competency for contracted works;
- (i) report near misses and incidents to Challenger facilities management team;
- (j) ensure that the health and safety of workers and the condition at the workplace are monitored for the purpose of preventing illness or injury of workers;
- (k) communicate any safety concerns to Challenger facilities management personnel for rectification; and
- (l) comply with any induction and site safety rule requirements.

5.6 Visitors' Responsibilities

All visitors shall comply with all relevant policies, rules, procedures and other guidelines as prescribed by Challenger from time to time.

All visitors are to register their attendance at reception upon entering the premises

5.7 WHS Committee Responsibilities

The WHS Committee, comprising representatives from across the Challenger business, meets quarterly to discuss and monitor WHS matters relevant to the Workplace. This group shall:

- (a) support Challenger initiatives by actively driving and promoting legal and company compliance requirements;
- (b) utilise available processes and resources to meet legal and company compliance requirements (i.e., establish and implement processes and mechanisms to communicate, measure, provide feedback and report key compliance related activities, and assign responsibility to designated persons for achievement of actions).
- (c) oversee adherence by Workers with legal and company compliance requirements, and implement appropriate measures in response to non-compliance;
- (d) act as a trusted point of contact for all Workers in relation to WHS matters relating to the Workplace, and, in particular, organise consultative mechanisms and forums to provide compliance information (including information regarding reporting hazards, risks and incidents) and to ensure corrective action is implemented in a timely manner to the extent of its influence, authority and responsibility;
- (e) review, assess and monitor risks and hazards identified by Workers on an on-going basis;
- (f) review this policy and related procedures and suggest changes to this policy to continually improve WHS performance;
- (g) oversee the process for communicating with Challenger employees and any visitors to our premises as required;
- (h) oversee that appropriate compliance records and reports are maintained and reviewed; and
- (i) report relevant discussions and outcomes from the WHS Committee to the Chief Human Resources Officer.

Details of Challenger's WHS representatives can be found throughout the workplace and on Connect, under [work, health and safety](#).

6. A Safe Work Environment

6.1 First Aid

Challenger has implemented processes to ensure that the first aid requirements provided in the Workplace are suitable for Challenger's operations, including maintaining:

- (a) an adequate number of Workers holding appropriate first aid qualification to deal with minor accidents and emergencies at the Workplace. These "*First Aid Officers*" have training and qualifications from St Johns Ambulance in accordance with statutory requirements; and
- (b) suitably stocked first aid boxes in common areas of the Workplace.

6.2 Emergency Procedures

Challenger has well-established emergency plans and procedures, including periodic emergency exit tests. A specified number of Workers from each floor of each Workplace are trained as fire wardens to assist Workers and visitors to exit via marked emergency exit signs. Training is conducted quarterly to ensure all fire wardens are up to date on current emergency procedures and review the effectiveness of evacuation exercises and arrange for procedure improvements. The names of fire wardens are displayed throughout the workplace and on Connect, [work, health and safety](#).

6.3 Hazards in the Workplace

A hazard is anything (including work practices or procedures) that has the potential to harm the health or safety of a person. Some hazards may be obvious, such as working at heights, while others are not as obvious, such as fatigue. Hazards can include:

- Physical – noise, radiation, light, vibration
- Chemical – poisons, dusts
- Biological – viruses, plants, parasites
- Mechanical / electrical – slips, trips and falls, tools, electrical equipment
- Psychological – fatigue, verbal abuse bullying.

Potential health and safety hazards in Challenger's Workplaces include:

- Quality of the work premises and work environment. For example, poorly configured workstations / ergonomics, inadequate lighting, etc.:
- unreasonable work demands;
- employee conduct and behaviours including bullying, discrimination and harassment, and work related stress during peak work periods;
- cleaning products, printer toner and other chemicals available in common areas;
- obstacles protruding in walkways, such as archive boxes and briefcases, and hot water provided in work kitchens;
- unattended liquid spills such as coffee or tea; and handling of heavy boxes or rearranging of heavy work furniture.

Health and safety hazards must also be considered, and addressed where required, as part of the planning for on-site or off-site work events, including:

- Kids to work day;
- Employee networking drinks;
- Volunteer days;
- Team off-sites; and
- Celebratory events such as the annual Christmas party.

6.3.1 Remediating and reporting risks and hazards

Everyone is responsible for identifying and contributing to the remediation of workplace hazards. Where a potential health and safety hazard is identified it should be remediated as soon as is reasonably practicable, and where possible, reported immediately using the [Identifying a Risk or Hazard Form](#) found on Connect. The Facilities Management team will assess the hazard, resolve the issue and communicate resolutions to all involved.

6.3.2 Ergonomics

Poor posture, workstation design and associated work practices increases, over time, the risk of postural strain, visual strain, muscle, and soft tissue injury.

To protect against this risk, Challenger provides information on appropriate work station set up and ergonomics on Connect using the [available work station guidelines](#) on Connect under work, health and safety. Workers should regularly assess their work stations and remedy any risks identified. Managers, with support from Human Resources if required, should monitor work environments, and identify and address any health and safety risks or issues.

6.3.3 Self-Assessment when working outside Challenger premises

Employees are required to complete a self-assessment prior to commencing a working remotely arrangement. Offsite working arrangements will be approved subject to the acknowledgement by the employee that they have read and will meet the requirements of the working remotely guidelines.

Working remotely guidelines are issued to employees on an annual basis and require an acknowledgement that they have read, understand and comply with them.

6.3.4 Stress, Bullying, Discrimination and Harassment in the Workplace

The risk of 'work related stress' arises where demands of the work environment exceed a Worker's ability to cope with (or control) those demands. Work related stress, where intense and / or persistent over a prolonged period, may result in risks to psychological and/or physical wellbeing including headaches, sleep disorder, chronic fatigue and psychological problems (such as poor concentration, suppressed anger, anxiety, depression, alcohol and other drug dependency).

Balancing and prioritising numerous and conflicting demands is a common work requirement. Similarly, many roles have annual work cycles or projects which lead to periods of increased work intensity. Managers are responsible for ensuring the demands placed on Workers are reasonable given expectations of the role, and for appropriately supporting Workers to achieve required outcomes. Workers at Challenger have the legal obligation not to bully any other person. Bullying is repeated, unreasonable behaviour directed towards an employee or group of employees, which may cause harm, including risks to health and safety. Challenger's [Workplace Bullying Policy](#) provides examples of workplace bullying and how workplace bullying should be addressed. Workers at Challenger have the legal obligation not to discriminate or harass any other person. Challenger's [Discrimination and Harassment Policy](#) provides examples of workplace discrimination and harassment, and how related matters should be managed.

6.3.5 Housekeeping and Cleanliness

Poor standards of housekeeping are a common cause of injury in the workplace. To maintain adequate standards of housekeeping, Challenger has implemented procedures to ensure:

- the workplace is cleaned on a regular basis;
- suitable waste containers or other storage facilities are provided to store rubbish prior to removal;
- the Workplace is inspected, informally as well as formally, and that any shortfalls in standards are dealt with quickly; and
- all walkways, stairs and corridors, especially those that form part of an emergency escape route, remain clear and free of any obstacles, restrictions or slip, trip or fall hazards.

In addition, Challenger encourages Workers to take responsibility for their work area and requests Workers:

- keep their desks and equipment clean and tidy;
- keep surfaces free from clutter;
- clear food waste and utensils from work areas and return to a kitchen;
- clean up any spills and assist with keeping common office areas tidy; and
- maintain appropriate hygiene in the bathrooms.

7. Incidents and Injuries

7.1 Accident and Incident Reporting, Recording, and Investigating

The reporting and investigation of all hazardous situations, near miss incidents and incidents resulting in injury provides a valuable opportunity to identify underlying causes to enable the implementation of appropriate corrective/remedial actions to prevent a recurrence and continually improve risk management strategies.

Challenger must keep a record of work-related illnesses and/or injuries to comply with WHS legislation.

If a Worker sustains an injury or illness in the Workplace, the Worker should initially seek the assistance of a First Aid Officer. The First Aid Officer will administer basic medical assistance or, if appropriate, call an ambulance. If the Worker leaves the Workplace immediately after the incident, they are responsible for advising their Manager.

Any Worker who sustains an injury or illness in the Workplace must complete an Accident or Injury Form as soon as is reasonably practicable (within a 24 hour timeframe), so the incident can be recorded on the Register of Injuries. If the Worker is unable to complete the Accident or Injury Form in the required time, the First Aid Officer or Manager must complete this on their behalf.

All accidents and injuries must be documented even if the injury or illness does not require medical attention, as Challenger aims to ensure that any existing safety hazards are rectified. The Record of Injuries is kept by Human Resources.

Incidents identified by the WHS Committee and the GRC as being 'serious' by virtue of their outcome, potential outcome or as giving rise to statutory reporting to a Workplace Safety Regulator may be subject of:

- (a) legal advice; and / or
- (b) more comprehensive analysis

7.2 Return to Work

Challenger provides Workers affected by work related injury or illness with occupational rehabilitation to facilitate recovery and an early and safe return to work. Challenger's dedicated Return to Work Coordinators (**RWC**) will assist the injured Worker to remain at, or return to, work as soon as possible after due assessment of the injury. This involves a partnership between the Worker, their manager, their RWC and Challenger's insurer. Challenger will:

- appoint a qualified RWC for occupational rehabilitation; and
- investigate all reported incidents/accidents in order to control workplace hazards and risks;
- develop a return-to-work plan to ensure early and safe return to work following injury/illness; ensure only suitable duties (where practicable) are undertaken by injured/ill Workers; and
- assist Workers to achieve their maximum pre-injury/illness capacity.

The relevant Worker's doctor will advise when the Worker is fit to resume working and provide the Worker with the appropriate medical documentation. At this point, the Worker should contact Human Resources, who will advise who their RWC is.

8. Reporting Requirements

The WHS Committee provides a report to the General Manager, Human Resources which sets out relevant discussions and outcomes from the WHS Committee bi-monthly meetings. The General Manager, Human Resources reviews the report and presents any pertinent information with respect to WHS matters to the Executive Risk Management Committee (ERMC), which in turn reports relevant items to the Board through the Group Risk Committee (GRC) report.

This reporting protocol is designed to ensure that all material WHS issues and serious incidents are made known to the Board and to facilitate identification of areas for continual improvement. Where areas for improvement are identified, the GRC and the WHS Committee will delegate responsibility to implement the improvement(s) and will then monitor the effectiveness of that delegation.

9. Training and Awareness

Challenger is committed to providing such information, instruction, and training as is necessary to ensure Workers can safely and competently carry out their assigned tasks (taking into account position responsibilities, mandatory legal training requirements, statutory licensing requirements, known or anticipated workplace risks, current safe work procedures and organisational requirements).

All Workers are required to receive the appropriate level of training and instruction relevant to their job.

10. Consultation and Communication

Consultation and communication concerning WHS matters is essential to providing a safe Workplace. Challenger is committed to clearly communicating its WHS principles and expectations, and detail how it manages WHS, complies with the WHS law and takes reasonable practicable steps to prevent incidents in the Workplace.

Challenger is also committed to establishing and maintaining consultative forums for Workers to promote understanding, co-operation and coordination at all levels of our organisation, raise WHS issues, offer suggestions and contribute to help keep the Workplace safe.

Consultation will be an ongoing process designed to constantly evaluate, monitor and review our business to make sure it is as risk-free as reasonably practicable.

Challenger also ensures that all relevant statutory notices are displayed throughout the Workplace, where applicable.

11. Records and Records Management

Challenger acknowledges the law requires specified WHS documentation be retained at the Workplace and that maintenance of WHS records is important for consistency, training, auditing and continuous improvement purposes.

Records are a means by which we demonstrate compliance with relevant WHS legislative requirements. The GRC ultimately holds responsibility for WHS documentation, including all policies, procedures, checklists and forms. No changes, amendments, inclusions or additions to current Challenger WHS documentation will be valid unless authorised by the GRC.

WHS management system documentation shall be retained for periods established by reference to prevailing legislative requirements and recognised best practice principles.

Records associated with particular risk management issues may be kept for longer than the specified period at the discretion of the GRC or otherwise destroyed upon reaching their retention limit.

Records shall be stored in areas that guarantee, as far as is reasonably practicable, protection against any disaster such as fire or flood with due consideration to selection of locations accessible to operations and operational staff essential to effective functioning of the system. Documents may be retained in hardcopy, film or electronically.

WHS related documentation shall be reviewed where circumstances make it necessary to do so, with all outdated or redundant documents being removed from all points of issue.

12. WHS Audits

This policy and Challenger's safe work practices will be subject to periodical independent WHS audits to establish the level of compliance with legislative and company compliance requirements and to develop continuous improvement initiatives.

WHS audits will involve examination of documentation as well as verification activity to determine standards of compliance with legislative and company compliance requirements and be undertaken by persons independent of those having direct responsibility for the policy's implementation who possess appropriate experience, training and qualification in WHS auditing.

The results of WHS audits will be subject to WHS Committee and executive management team review and outcomes disseminated via the company's consultative forums to:

- ensure all Workers are appraised of Challenger's progress;
- system deficiencies identified in the audit will be documented in a corrective action plan; and
- subject to quarterly review by the WHS Committee pending satisfactory resolution.

13. Whistleblower Policy

Challenger has a Whistleblower Policy and encourages disclosures from employees, former employees and suppliers regarding any unethical, illegal, corrupt or other inappropriate conduct including in relation to this policy. The Whistleblower Policy is available on Connect and www.challenger.com.au.

14. Risk Appetite and complying with this Policy

Challenger's vision is to provide Customers with financial security for retirement. Challenger promotes a positive culture of risk awareness and transparency, including open communication and challenge of current and emerging risks, speaking up regarding matters of concern and the proactive management of issues and incidents. Challenger has no appetite for conducting business activities unfairly or in contravention of the law, or which knowingly damage or are inconsistent with its brand and reputation. Challenger has no appetite for employees intentionally not following policies and procedures.

Employees are to comply with Challenger policies and are responsible for familiarising themselves with the policies relevant to their role. Policies are available on the intranet.

Incidents of non-compliance with this policy are to be reported in line with the Challenger Incident Management Policy.

Employees at Challenger are held accountable for their actions. Consequences for non-compliance with this Policy may include but are not limited to:

- a requirement to undertake additional training;
- increased supervisions;
- a verbal warning;
- a written warning (including a first and final written warning);
- an impact to performance rating or promotion;
- a financial consequence; and / or
- dismissal.

For further details, please refer to the Challenger Limited Conduct Risk and Consequence Management Framework.

15. Point of Contact

The Chief Human Resources Officer or the Human Resource Business Partners are the contacts for any queries arising from this Policy.

16. Review Cycle

This Policy will be reviewed every two years or as required if there are material changes in either the regulatory framework or business activities.