

CROWLEY  PTY. LTD.
E X C A V A T I O N

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ACCREDITED PIPELINE CONTRACTOR

INTEGRATED MANAGEMENT SYSTEM
& POLICY MANUAL

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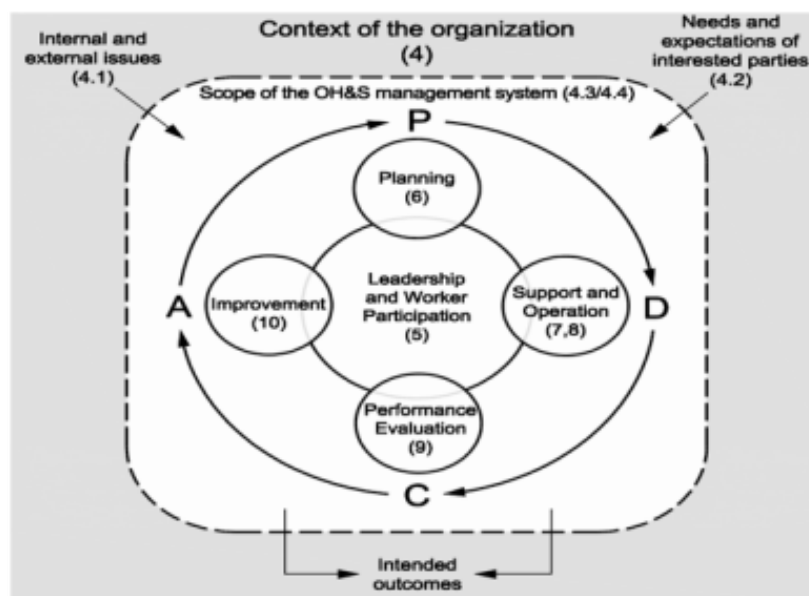
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PURPOSE – IMS MANUAL

The purpose of Crowley Excavation’s Integrated Management System (IMS) Manual is to provide interested parties with a context of the organisation’s ability to the achieve outcomes of ISO 9001:2015 Quality Management Systems, ISO 45001:2018 Occupational Health & Safety Management Systems, and ISO 14001:2015 Environmental Management Systems.

This manual clearly defines the systematic approach used by the organisation to identify and manage internal & external concerns that are relevant to its purpose, its strategic direction and aspects that may affect its ability to achieve intended outcomes. Crowley Excavation applies the Plan, Do, Check & Act (PDCA) cycle to assist it meet the requirements of all three standards and to achieve all intended outcomes.



Source: ISO 14001:2015 Environmental Management Systems

Crowley Excavation’s IMS & Policy Manual is made available to interested parties via the organisation’s website, Project Management Plans (PMPs), and upon request.

SCOPE – IMS MANUAL

Crowley Excavation’s IMS and its associated policies, procedures, forms, checklists and other processes apply to all aspects of the organisation’s activities including the provision of civil construction activities, inclusive of earthworks, drainage, sewer main and water main construction, and general pavement works.

ORGANISATIONAL OVERVIEW

Crowley Excavation is a civil construction company, committed to providing quality pipeline installation to a variety of clients across metropolitan and regional Victoria. The organisation, founded in 2013, boasts a proud history, experienced staff and a wide inventory of modern plant and equipment.

Crowley Excavation undertakes works for a wide range of clients including water authorities, regional water & sewerage authorities, local government, statutory authorities, land developers and other private clients. The organisation is committed to meeting client and company needs, and maintaining and enhancing our position as both a recognised and respected name in the delivery of projects within the industry.

The organisation undertakes the following activities for our clients:

| | |
|-------------------------------------|--------------------------------------|
| Sewer & Water Pipeline Installation | Plant & Equipment Hire |
| Sewerage Reticulation Works | Pipeline Testing |
| Live Sewer Connections | Pipeline Location |
| Confined Space Work | Service Locating |
| Sewer Branch Relocations | PE Pipe Welding |
| Manhole Building & Alterations | Bulk Earth Works |
| Water Reticulation Works | Diesel Mechanical Repairs |
| Water Main Connections | Welding Fabrication |
| Stormwater & Outfall Drainage | Other Civil Engineering Construction |

Crowley Excavation is committed to providing a quality service to our clients and interested parties by developing long term relationships to achieve intended outcomes. To realise this, the organisation maintains an Integrated Management System (IMS) to identify and manage internal & external concerns that are relevant to its purpose, its strategic direction and aspects that may affect its ability to achieve intended outcomes.

The application of all aspects of the organisation's IMS is rigorously assessed both internally and by external parties to ensure compliance with ISO 9001:2015 Quality Management Systems, ISO 45001:2018 Occupational Health & Safety Management Systems, and with ISO 14001:2015 Environmental Management Systems, legal and other requirements.

TERMS & DEFINITIONS (KEY)

Audit: A systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled.

Continual Improvement: A process of enhancing an organisation's management system to achieve improvement in overall performance, in accordance with the organisation's policy commitments.

Corrective Action: An action to eliminate the cause of non-conformance (not fulfilling a requirement) and to prevent reoccurrence.

Environmental Management System: Part of the IMS used to manage environmental aspects, fulfill compliance obligations and address risk and opportunities.

Environmental Aspects: Elements of an organisation's activities, products or services that interact or may interact with the environment.

Environmental Impact: Change to the environment, whether adverse or beneficial, wholly or partially resulting from the organisation's aspects.

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

Integrated Management System (IMS): A management system that combines all interrelated components of an organisation's activities into one system to facilitate ease of management and operations.

Interested Parties: A person or organisation that can affect, be affected by or perceive itself to be affected by a decision or activity.

Objective: A result to be achieved by a person, group of people or an organisation.

Occupational Health & Safety Management System: Part of the IMS used to manage health & safety hazards, fulfill compliance obligations and address risk and opportunities.

Organisation: People or a group of people that has its own functions with responsibilities, authorities and relationships to achieve objectives.

Project Management Plan (PMP): A formal, approved suite of documents used to guide both project execution and project control.

Quality Management System: A set of interrelated or interacting elements of the organisation to establish policies and objectives, and processes to achieve those objectives.

Risk: The likelihood and the consequence of harm occurring.

Top/ Senior Management: A person or group of people who directs or controls an organisation at the highest level.

Source: ISO 9001:2015 Quality Management Systems, ISO 45001:2018 Occupational Health & Safety Management Systems, and ISO 14001:2015 Environmental Management Systems.

ORGANISATIONAL CONTEXT

Crowley Excavation (CE) uses the process of Strengths, Weaknesses, Opportunities and Threats (S.W.O.T) Analysis to identify internal & external issues that are relevant to its purpose and that may affect the organisation's ability to achieve the intended outcomes of its IMS.

Top Management (Rory Crowley) and CE's Management Team monitors & reviews the organisation's existing S.W.O.T Analysis annually to ensure that it remains relevant to its activities, and that any new or emerging Strengths, Weaknesses, Opportunities or Threats are identified with appropriate actions and responsibilities assigned. Consideration is given to issues arising from legal requirements, technology, competitors, markets, local, regional and economic environments, health, safety & environmental activities.

INTERESTED PARTIES

Crowley Excavation (CE) periodically identifies, reviews and monitors the needs and expectations of all interested parties. The three management system standards define an interested party as a *“person or organization that can affect, be affected by or perceive itself to be affected by a decision or activity.”*

Crowley Excavation identifies the needs and expectation of the following parties and, via various aspects of its IMS achieves intended outcomes:

- » Crowley Excavation's Employees (Recruitment, Training, Experience & Succession)
- » Contractors (Suitability & Capacity)
- » Other Infrastructure Service Providers (Gas / Electricity / Construction)
- » Clients
- » Client Representatives
- » State Authorities (WorkSafe, Environmental Protection Authority (EPA), VicRoads)
- » Local Government Authorities (Victorian Government, Local & Regional Councils)
- » Victorian Water Authorities (Yarra Valley Water, Greater Western Water, Goulburn Valley Water, Coliban Water, Central Highlands Water, Barbon Water)
- » Members of the public
- » Neighbouring or adjoining landowners

The organisation manages the needs and expectations of interested parties throughout all stages of its activities, by developing and maintaining open and collaborative relationships with all stakeholders.

Crowley Excavation maintains an “Interested Parties Register” within its “Legal & Other Obligations Register” to ensure that control measures for ensuring the needs and expectation of all interested parties have been considered and are implemented.

A review of all interested parties and identified control measures is conducted as part of the “Management Review” processes.

THE SCOPE OF THE IMS

Prior to engaging in any tender process, at the project planning stage, and before the commencement of any new work, Crowley Excavation determines the physical and organisation boundaries, as well as applicability to which the IMS applies. The identification of boundaries and applicability assists the organisation in identifying a scope.

The scope of the IMS for individual projects is determined by CE Management in collaboration with the relevant Project Managers and Supervisors. In determining the scope, consideration is given to the extent of control or influence the organisation has over activities, products and services. Given the organisation has no control or influence over the design and construction requirements of the clients, the scope of the IMS is often limited.

The scope of the IMS for each project identifies interested parties who may be affected by the planned works and operational activities. It also identifies the needs and expectations (or requirements) of those interested, and which of these needs and expectations require specific attention.

The scope of the IMS for each project is clearly defined within the Project Management Plan (PMP).

INTEGRATED MANAGEMENT SYSTEM (IMS)

Crowley Excavation maintains a management system that integrates all aspects of its Quality, Occupational Health & Safety, and Environmental Management. The organisation actively establishes, implements, maintains and continually improves its Integrated Management System (IMS) in accordance with requirements of ISO 9001:2015 Quality Management Systems, ISO 45001:2018 Occupational Health & Safety, and ISO 14001:2015 Environmental Management Systems.

To ensure the organisation's ability to achieve the intended outcomes of its IMS, Crowley Excavation makes certain that sufficient physical and financial resources are made available. These resources enable members of CE Management and Workers (employees and subcontractors) to systematically plan, implement, control, monitor and review aspects of the organisation's activities that may pose a risk or in any way affect interested parties.

The IMS also assigns responsibilities and authorities for processes, and integrates aspects of the organisation's activities relating to procurement, human resource management, sales and marketing.

LEADERSHIP & COMMITMENT

Senior Management at Crowley Excavation demonstrates leadership and commitment with respect to all aspect of its Quality, Occupational Health & Safety, and Environmental Management. This commitment is clearly defined in the organisation's policy statements and reflected throughout its procedural documents and systems of work.

To achieve this, the organisation's Top Management:

- » Take accountability for the effectiveness of the IMS,
- » Ensure that organisational policies clearly communicate its commitment to Quality, Occupational Health & Safety, and Environmental Management,
- » Establish and maintain objectives for the IMS that are compatible with the organisation's context and its strategic direction,
- » Promote and implement a process approach and risk-based thinking,
- » Ensure that physical and financial resources are made available for the implementation, management and continual improvement of the IMS,
- » Fulfil the organisation's compliance obligations,
- » Participate in the IMS review process.

Crowley Excavation's Senior Management are customer focused, ensuring that all customer needs, applicable statutory & regulatory requirements are understood and met. An emphasis on enhancing customer satisfaction is also achieved via open and consistent communication with clients throughout the project. Customers are encouraged to also provide feedback as to the quality of the service provided and opportunities for improvement via the organisation's customer feedback process.

All roles, responsibilities and authorities relevant to all Crowley Excavation's employees are clearly defined in all position descriptions, procedural documents and employee induction booklets. These are also regularly communicated to all parties via project management plans (PMPs) and project meetings including preconstruction meetings, and daily pre-start toolbox meetings.

To achieve the intended outcomes relating to leadership and commitment, Crowley Excavation's Top Management delegate their responsibility to the Management Team, but retain accountability for ensuring that the above-mentioned actions are performed.

QUALITY POLICY

Crowley Excavation is committed to exceeding customer expectations, whilst maintaining and enhancing the company's position as a premier service provider within the civil construction industry. This goal is achieved through implementation of our Integrated Management System (IMS), which aims to provide our clients and interested parties with the assurance that the services provided by Crowley Excavation meet their current and future needs and expectations.

To consistently deliver a quality service that guarantees customer satisfaction, Crowley Excavation will:

- » Complete projects on time, on budget, and in accordance with client requirements;
- » Understand and adhere to the needs and expectations of clients and interested parties;
- » Establish and pursue quality objectives and targets designed to improve customer service and satisfaction;
- » Comply with all relevant legislation and regulations, and any other requirements that are placed on us, or to which we subscribe;
- » Maintain a competent and committed workforce that are fully understanding of our Integrated Management System policies, objectives and procedures;
- » Consult with employees regarding their legal rights and responsibilities;
- » Consult with employees regarding the requirements of interested parties, processes and resources required for successful project outcomes;
- » Monitor, measure and analyse all aspects of the organisation's operations via Management Review to ensure conformity with established processes, and to identify improvement initiatives;
- » Engage with interested parties to establish mutually beneficial relationships;
- » Maintain a certified Quality Management System in accordance with the requirements of ISO 9001:2015 Quality Management Systems.



Rory Crowley
Managing Director

16/01/2024

HEALTH & SAFETY POLICY

Crowley Excavation recognises the inherent risks associated with civil construction and are committed to ensuring the safety and welfare of all employees, interested parties and those the organisation may influence. Crowley Excavation believes that providing a safe and healthy work environment contributes in a significant way to the quality of our work and the sustainability of our business.

To maintain a safe and healthy workplace for all those associated with the company, Crowley Excavation will:

- » Comply with all relevant OH&S legislation and regulations, and other requirements that are placed on us, or to which we subscribe;
- » Understand the needs and expectations of interested parties;
- » Develop, implement and maintain procedures for hazard identification, assessment and control covering all of our activities, and of those who we may influence;
- » Establish and pursue occupational health & safety objectives and targets that focus on improving management performance by eliminating or minimising risks of workplace illness or injury;
- » Identify competencies required for the establishment and management of a safe and healthy workplace, and ensure such competencies are always retained within our workforce;
- » Endeavour to ensure that workplace bullying and harassment does not occur;
- » Identify potential emergency situations and establish procedures for their prevention and response;
- » Consult and engage with employees and other stakeholders to reduce workplace risks and improve health conditions;
- » Consult with our employees regarding their health and safety rights and responsibilities in the workplace;
- » Ensure occupational rehabilitation for injured or ill employees, without them being prejudiced or disadvantaged, and to guarantee that effective return to work (RTW) plans are developed and implemented as required;
- » Maintain a certified Occupational Health & Safety Management System in accordance with the requirements of ISO 45001:2018.



Rory Crowley
Managing Director

16/01/2024

ENVIRONMENTAL POLICY

Crowley Excavation is committed to the preservation of the environment and prioritises this to be of a high importance in the delivery of our services. The organisation's prime aim is to ensure a minimal impact on the environment when performing civil construction works.

Crowley Excavation believes that the performance of its environmental management system reflects the high quality of our work, and the sustainability of our business.

To protect and improve the state of the environment in which the business operates, Crowley Excavation will:

- » Comply with all relevant environmental legislation and regulations, and other requirements that are placed on us, or to which we voluntarily subscribe;
- » Understand the needs and expectations of all interested parties;
- » Develop, implement and maintain procedures for environmental impact identification, assessment and control, covering all of the organisation's activities, and all of those who we may influence;
- » Establish and pursue environmental objectives and targets that focus on pollution prevention, mitigation of adverse environmental impacts and improved environmental conditions;
- » Identify competencies required to achieve our environmental policy and objectives and ensure that such competencies are always retained within our workforce;
- » Identify emergencies scenarios and potential incidents that may impact on the environment and establish procedures for their prevention and response;
- » Consult with our employees regarding their environmental rights and responsibilities.
- » Consult and engage with our employees and with interested parties to improve our environmental management performance, and that of others operating in the civil construction industry;
- » Maintain a certified Environmental Management System in accordance with the requirements of ISO 14001:2015.



Rory Crowley
Managing Director

16/01/2024

PLANNING

Actions taken to address risks and opportunities

Rigorous planning is undertaken by Crowley Excavation to ensure that intended outcomes of Quality, Occupational Health & Safety, and Environmental Management are achieved. The organisation identifies critical risk and opportunities for improvement to all aspects of its operations via its Risks and Legal Obligations Registers.

Prior to the commencement of any work, Project Managers and Supervisors are required to identify legal & other requirements relevant to the work to be completed, as well as hazards, environmental and quality impacts that have the potential to adverse effect. Management strategies implemented and control measures applied form the basis of project specific management plans.

Occupational Health & Safety Hazards & Risks

Crowley Excavation maintains a documented procedure to support the identification of Health and Safety hazards, the risk assessment process and controls to be implemented to reduce risks related to its activities over which it has control or influence. Occupational Health & Safety hazards are identified and analysed for risks in the organisation's Risk Registers, which is referred to in the planning of all activities and operations.

A risk analysis of Health & Safety hazards is completed for each new project considering contract requirements, and the nature, type and location of operations. This process also identifies applied controls and applicable legal and other requirements.

Identified Health and Safety hazards and risks are taken into account at all times in the implementation and maintenance of the Integrated Management System, including project management planning and the setting of Health and Safety objectives and targets.

Environmental Aspects & Impacts

Crowley Excavation maintains a documented procedure to identify the environmental aspects of its activities and services that it can control and those it can influence in order to determine those that can have significant impact(s) on the environment. Environmental aspects and impacts are identified and analysed for significance in the organisation's Risk Registers which is referred to in the planning of all activities and operations.

Analysis of the significance of environmental aspects, calculating both risks and values is undertaken for each project, considering the contract requirements, the nature, type, and the location of operations. This process also identifies applied controls and applicable legal and other requirements.

Identified significant environmental aspects are taken into account at all times in the implementation and maintenance of the Integrated Management System, including project management planning and the setting of environmental objectives and targets.

Legal & Other Obligations

Crowley Excavation maintains a documented procedure to assist with the identification of all aspects of the organisation's compliance requirements. This includes statutory & regulatory requirements, Quality, Occupational Health & Safety, and Environmental legal obligations, as well as other requirements, or requirements to which the company subscribes. The organisation maintains a "Legal & Other Obligations Register" that categorises all compliance requirements relevant to its activities & services. The register defines activities undertaken throughout all projects and operations to achieve compliance.

The organisation subscribes to a number of regulatory websites to ensure that it remains up-to-date with any new requirements or changes to existing requirements. This process is maintained by Cowley Excavation's Management Team.

Project Managers and Supervisors are required to identify Legal & Other Obligations and embed all control measures into the Project Management Plan (PMP), prior to commencing any projects.

Objectives & Planning

Senior Management at Crowley Excavation establish Quality, Occupational Health & Safety, and Environmental objectives for various levels and functions of the organisation. These objectives are measurable and are established annually, with consideration given to significant health & safety hazards, and environmental aspects. Objectives are consistent with the organisation's individual Quality, Occupational Health & Safety, and Environmental Policies, and are communicated to all levels and functions of the organisation via various meetings, including staff meetings and other toolbox meetings.

When establishing Quality, Occupational Health & Safety, and Environmental objectives, consideration is given to:

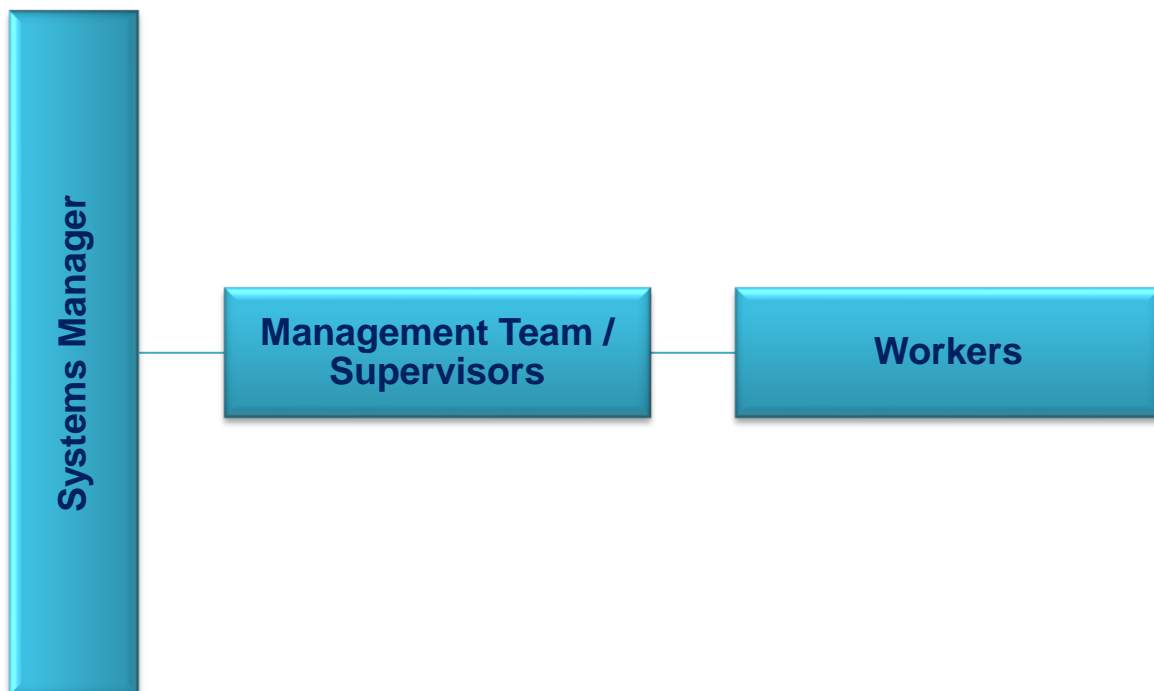
- » What needs to be done to reduce the likelihood of the adverse impacts?
- » What resources will be required to ensure achievement?
- » Who will be responsible for the implementation & monitoring of various controls, as well as for measuring achievement?
- » Anticipated timeframes for achievement?
- » How achievement will be evaluated?

Management Plans are maintained to support achievement of various objectives and are embedded into individual Project Management Plans (PMPs).

SUPPORT

Resources

Crowley Excavation (CE) maintains sufficient resources to the implementation, maintenance and continual improvement of its Integrated Management System (IMS). The organisation permanently appoints Systems Manager governed with the responsibility for the ongoing management of its IMS.



Financial resources are also made available to support the implementation of the organisation's IMS. Physical and financial resources are accounted for via the organisation's fiscal budgets.

Competence

Crowley Excavation (CE) ensures that any worker engaged to undertake activities or provide a service is suitably qualified and has sufficient competence. Prior to employment, CE Management identifies the required experience, licenses & accreditation required to be maintained by prospective candidates. These requirements are clearly defined in all position descriptions, with competency and experience assessed as part of the employment process.

To further support the management of training competencies of all employees and subcontractors, the organisation maintains competency records on a web-based platform designed for construction contractors, called "Assignar", which identifies all qualifications, training & other requirements for various defined roles. This application is maintained by the Management Team, and is regularly reviewed and updated to ensure all CE workers hold current licences, competencies and inductions, as well as a record of industry experience and any key accreditations.

The Management Team in consultation with Supervisors are responsible for ensuring that all employees and subcontractors maintain current training competencies, licences and accreditation as required, and that they possess the relevant experience required at the project planning stage.

Arrangements are made as required to ensure that training and any re-accreditation or refreshers courses are completed before they expire.

Awareness

Crowley Excavation (CE) takes time to ensure that all workers including employees and subcontractors are aware of the requirements of its IMS and associated processes.

The organisation achieves this by:

- » Communicating to all stakeholders, requirements of Quality, Occupational Health & Safety, and Environmental policies,
- » Making these IMS Policies publicly available, and displayed at all CE workplaces,
- » Regular communication of the organisation's objectives,
- » Conducting regular IMS awareness training with all employees & subcontractors,
- » Communicating the benefits of worker contributions participating in relevant aspects of the IMS,
- » Communicating to all workers the implications for non-conformance.

Crowley Excavation conducts regular IMS awareness training to ensure that all employees and subcontractors are aware of not only the organisation's responsibilities, but also the worker's responsibilities for the implementation, maintenance and continual improvement of all aspects of the IMS, including its impact on the business and its ISO certification.

Communication & Consultation

Crowley Excavation (CE) maintains a documented procedure to ensure effective communication and consultation across all of the organisation's levels and functions. Its "Communication, Consultation & Reporting" system procedure clearly defines:

- » What will be communicated?
- » When communication is to occur?
- » Who will be communicated to?
- » How communication is to occur?
- » Who will be responsible for the communication?

The organisation also ensures that all legal and other requirements are communicated to all employees, subcontractors and interested parties via operational controls, including:

- » Posting of important notices on the organisation's OHS Notice Board,
- » Emails & other digital notices shared on CE's "Band app" or "OneDrive" platform,
- » Various team meetings, including CE staff meetings and project pre-start toolbox meetings.

Crowley Excavation's Management Team and Supervisors are responsible for communicating relevant aspects of the organisation's Integrated Management System (IMS) with interested parties via the Project Management Plan (PMP).

In accordance with Occupational Health & Safety obligations, the organisation consults with all workers, including employees and subcontractors on a regular basis. This is achieved by the sharing of important notices and information via web-based platforms to which the organisation subscribes, or in person with workers via various team meetings or hard-copy document handouts. Records of notices and discussions are maintained by Managers and Supervisors.

Documented Information

Crowley Excavation (CE) maintains a documented procedure and supporting processes to ensure the control of all aspects of document and data management.

Creating & Updating

The organisation's "Document & Data Control" system procedure outlines the process for creating and updating CE documents including policies, procedures, documents, forms and checklists, etc. It defines the approval process, document identification and description, as well as the process for reviews and issuing. The Systems Manager maintains a "Master IMS Documents Register" to support all aspects of document creation, storage and review.

Control of Documented Information

Crowley Excavation maintains processes to ensure that all IMS documents are available for use where required, and are adequately protected. The Systems Manager maintains a "Master IMS Documents Register" to support control, distribution, storage, versioning, retention and disposal of the organisation's documentation as required.

OPERATIONS

Operational Planning & Control

Crowley Excavation (CE) identifies, plans, and implements control measures to ensure the Quality, Occupational Health & Safety, and Environmental integrity of its projects are not compromised. The organisation achieves this by establishing and maintaining Project Management Plans (PMPs) comprising a variety of control mechanisms.

A variety of operational controls employed by the organisation include:

- » Emergency (Incident/ Accident) Preparedness & Response Plans
- » OHS Coordination Plans (Roles & Responsibilities)
- » Safe Work Method Statements (SWMSs)
- » Safe Work Procedures (SWPs)
- » Job Safety Analysis (JSAs)
- » Operational Procedures
- » Toolbox Meetings/ Discussions
- » Internal Training/ Verification of Competencies (VOCs)
- » Inspection & Test Plans (ITPs)
- » Plant & Equipment Prestart Inspections
- » Management/ Supervisors Meetings
- » Staff Meetings (All Workers)
- » Management Review (Top Management)

The organisation maintains a comprehensive “QSE Risk Register” to support Project Managers and Supervisors when planning works. This register lists all identified hazards and risks, environmental and quality aspects and impacts, and suggested control measures to be implemented to reduce the likelihood of harm or non-compliance.

Prior to the commencement of any work, Project Managers and Supervisors are required to refer to the “QSE Risk Register” to determine specific operational controls to be implemented. All relevant controls are embedded into the project specific Project Management Plans (PMPs).

To further support the implementation of identified operational controls, all employees and subcontractors are required to undergo a formal project induction. Copies of this induction are maintained in the PMP and kept on the project site at all times.

The organisation’s project planning process further supports the implementation of required documentation such as “Safe Work Method Statements” (SWMSs), “Safe Work Procedures” (SWPs), “Job Safety Analysis” (JSAs), etc. These documents are regularly reviewed by the Management Team so that they remain relevant and effective. This process is facilitated by the organisation’s Managers in consultation with Supervisors and CE workers including employees and subcontractors.

Emergency Preparedness & Response

Crowley Excavation (CE) maintains a documented procedure and associated processes to identify the potential for emergency situations and incidents that can impact on health, safety, the environment or quality of the services associated with its operations.

“Emergency (Incident/ Accident) Preparedness & Response Plans” are developed and maintained for a variety of scenarios for all CE workplaces.

Emergency scenarios considered include (however are not limited to):

| |
|--|
| Construction Plant Roll Over |
| Excavation/ Trench Collapse |
| Trapped in a Trench (due to illness or injury) |
| Medical Emergencies |
| Contact with Assets (electricity, gas, other) |
| Natural Disaster (bush fire/ flooding) |
| Explosion (unplanned or unexpected) |

Managers in consultation with Supervisors are responsible for developing a project specific Emergency Preparedness & Response Plan (EPRP) prior to the commencement of any work. The EPRP forms part of the Project Management Plan, which are both prominently displayed at all CE project sites, in the care of the Project Supervisor.

All Emergency Preparedness & Response Plans are periodically tested and reviewed.

PERFORMANCE & EVALUATION

Monitoring, Measuring, Analysis & Evaluation

Crowley Excavation (CE) plan and implement monitoring, measurement, analysis and improvement processes to demonstrate product conformity, and to ensure conformity with and improvement to the Integrated Management System, and the organisational policies and objectives.

The organisation maintains a documented procedure and associated processes to ensure:

- » What requires measuring & monitoring,
- » The methods for monitoring, measuring, analysis & evaluation are applicable to ensure valid results,
- » When monitoring & measuring is to be performed,
- » How the results from monitoring & measuring are to be analysed and evaluated,
- » Plant and equipment that needs to be calibrated,
- » The effectiveness of IMS implementation,
- » Meaningful communication of performance with interested parties.

CE Management manages all aspects of monitoring, measuring, analysis & evaluation.

Control of externally provided processes, products and services

Crowley Excavation (CE) maintains a procedural document and supporting process for the management of external service providers, (subcontractors) products and services. The organisation's purchasing procedure clearly defines arrangements made for the procurement of services and products, and the actions required where non-conforming products and services are identified.

A list of approved products and suppliers is maintained within the organisation's Assignar platform, as well as in the office administration system. Quotes and purchase orders are required for all significant purchases and must be submitted to the Senior Management for approval.

Customer Satisfaction

To ensure the continual improvement of the products and services provided by the organisation, Crowley Excavation (CE) monitors customer/ client perceptions and satisfaction throughout a project's life-cycle. Project Managers and Supervisors maintain daily communication with the customers/ clients to ensure their needs and expectations are realised. CE's Management Team also encourages and provides customers/ clients with the opportunity to provide formal feedback on the products and services provided.

Evaluation of Compliance

Crowley Excavation (CE) maintains a procedural document and supporting process for evaluating compliance with legal and other requirements. This is facilitated by CE Management, and is achieved by a program of internal and external audits.

Internal Audits

Crowley Excavation (CE) maintains a documented procedure and associated processes that defines the mechanism of internal audits to determine conformity with the requirements of the Integrated Management System (IMS). This includes an annual assessment of the effectiveness of the organisation's IMS, as well as evaluation of legal and other requirements. The "Audit" system procedure determines audit criteria, scope, frequency and methodology and details responsibilities and requirements for planning and conducting internal audits, and for reporting results and maintaining records.

An "IMS Audit Schedule" is maintained to assess the effectiveness of processes for product realisation, health, safety & environmental management. The program includes planned audits, compliance evaluations and inspections of IMS procedures, instructions and processes.

Management Review

Crowley Excavation (CE) reviews its IMS annually to ensure its continuing suitability, adequacy and effectiveness.

Management Review includes, but is not limited to:

- » An assessment of internal and external audit findings
- » Identified opportunities for improvement
- » Progress against completion of Objectives & Management Plans
- » A review of new policies, procedures and processes
- » A review of required amendments to policies, procedures and processes;
- » Adequacy of resources
- » Legal & Other requirements
- » Significant hazards and aspects
- » Emergency incidents/ accidents
- » Training requirements
- » Customer/ client feedback
- » The performance of suppliers/ external service providers
- » Non-conformances
- » Opportunities for improvement
- » Threats, challenges and competitors
- » The status of corrective and preventative actions

Management Review agenda items and minutes are taken, identifying decisions made and actions required related to amendments to the organisation's IMS and associated policies, procedures, forms, registers, processes and any other elements relevant to support continual improvement.

IMPROVEMENT

Nonconformity & Corrective Action

Crowley Excavation (CE) maintains a documented procedure and associated process to identify and address opportunities for improvements, non-conformance and preventative actions associated with its activities.

The organisation's process for the management of nonconforming and corrective action aims to ensure:

- » The collection of information and records to support the effectiveness of all aspects of Crowley Excavation's IMS,
- » Opportunities for improvement are identified, and appropriate actions are assigned,
- » Non-conforming products are prevented from inadvertent use or installation,
- » Non-conformances relating to organisational activities and application of all aspects of the IMS are identified with corrective actions assigned,
- » All potential non-conformances are identified,
- » All non-conformances are recorded, analysed to determine root causes, and actioned to avoid their recurrence,

- » All corrective and preventive actions are reviewed to determine their effectiveness, and any necessary changes to IMS documentation reflecting the corrective or preventive actions are undertaken.

Continual Improvement

Crowley Excavation (CE) is committed to the continual improvement of its Integrated Management System (IMS) to improve its suitability, adequacy and effectiveness. To achieve this, the organisation considers the results from analysis and evaluation of performance, as well as outputs from Management Review of needs or opportunities that need to be addressed to facilitate continual improvement.

References

- » ISO 9001:2015 Quality Management Systems
- » ISO 45001:2018 Occupational Health & Safety Management Systems
- » ISO 14001:2015 Environmental Management Systems



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