



Tower Limited

Health, Safety & Wellbeing Policy

May 2024

Policy Name	Tower Limited Health, Safety & Wellbeing Policy
Policy Type	Board Policy
Policy Preparer	Andrew Hambleton
Policy Owner	Tower Limited Board
Policy applies to	All officers and employees of Tower Limited and its subsidiaries
Version Number	4.0
Approver	Tower Limited Board of Directors
Date of Approval	June 2024
Effective From	1 June 2024
Date of Next Review	1 June 2026
Tower locations covered by this policy	American Samoa, Cook Islands, Fiji, New Zealand, Samoa, Tonga
Policies Replaced by This Document	Tower Limited Health & Safety Policy Version 3.1
Supporting Documents	<p>The Health, Safety & Wellbeing Policy should be read in conjunction with:</p> <ul style="list-style-type: none"> • Code of Conduct • Whistleblower Policy • Tower’s Health, Safety and Wellbeing Policy Statement • Diversity, Equity and Inclusion Policy

Document History

Version	Date	Changes	Reason for change	Author	Date Approved
1.0	May 2018	First version as recommended by the Governance Manager & Company Secretary	Implementation of policy in accordance with best practice	Lara Teesdale	28 May 2018
2.0	May 2020	Incorporates recommendations from the 2019 Health & Safety Management System audit that was completed by KPMG. Minor updates to align with the wording in the Health and Safety at Work Act 2015, the Institute of Directors Health and Safety Guide: Good Governance for Directors 2016, and the Tower Health and Safety Policy Statement	Review	Hannah Snelling	May 2020

3.0	March/April 2022	Minor amendments. Minor update to include changes in flexible working and appropriate workstation set up in all work locations	Review	Jacky McManus	April 2022
3.1	August 2022	Minor amendments. Minor update to include Director visits and expand on worker engagement	Review	Jacky McManus	August 2022
4.0	May 2024	Formatting updates. Incorporation of Pacific regulatory requirements including addition of Committee duties	Review	Megan Powers	June 2024

1 Introduction

- 1.1 Tower Limited and its subsidiaries (together referred to as **Tower**) are committed to providing a healthy and safe working environment for workers and other relevant persons (for example, visitors, customers etc) who may be affected by Tower's activities.
- 1.2 This Policy sets out Tower's commitments and obligations in relation to health, safety and wellbeing. As a Person Conducting a Business or Undertaking (**PCBU**), Tower is required to comply with the following legislation (the **relevant legislation**):
- Health and Safety at Work Act 2015 (New Zealand and Cook Islands).
 - Health and Safety Work Act 1996 (Fiji).
 - Occupational Safety and Health Regulation 2017 (Samoa and American Samoa).
 - Public Health Act 2016 (Tonga).
- 1.3 Health and safety is paramount at Tower. Everyone at Tower contributes towards a safe working environment, a positive safety culture and continuous improvement of the health, safety and wellbeing of our workers. Where employees are working from home, this Policy should be read alongside:
- Relevant legislation and guidance.
 - Tower's Health, Safety and Wellbeing Policy Statement (Appendix A).
 - Any applicable Health and Safety Risk Assessment(s).
 - Flexible Working Policy or Approaches.

2 Principles

- 2.1 Tower is committed to providing a healthy, safe and supportive environment for all our workers and eliminating risks to health and safety as far as is reasonably practicable.
- 2.2 Tower acknowledges that many Tower employees work flexibly, working a combination of in the office and from home. It is therefore expected that both (or all) locations will be set up appropriately as per the guidelines.
- 2.3 Tower will provide a robust health and safety risk management system that is maintained, monitored and regularly reviewed for continuous improvement.
- 2.4 Health, safety and wellbeing includes all aspects of physical safety, as well as mental and emotional wellbeing.
- 2.5 Health, safety and wellbeing is everyone's responsibility at Tower. Tower will strive to create a positive and pro-active culture of health and safety awareness through leadership, worker engagement and risk management.

- 2.6 Any action that puts the health, safety or wellbeing of the Tower team and customers at risk will be managed appropriately to ensure a positive safety culture.

3 Responsibilities

All Officers (being Directors and the Executive Leadership Team)

3.1 All Officers:

- Should keep updated about best practice matters relating to health, safety and wellbeing.
- Will exercise care, skill and due diligence to ensure that Tower complies with its duties and obligations under relevant legislation. Due diligence includes taking reasonable steps to understand Tower's operational health and safety risks, and ensure they are appropriately managed and resourced.
- May obtain external health and safety advice where reasonable and appropriate.
- Should commission periodic external reviews of Tower's health and safety systems, processes and practices to ensure continued alignment with best practice.

Directors

3.2 Tower Directors are responsible for:

- Monitoring and reviewing Tower's health, safety and wellbeing risks.
- Determining and regularly reviewing Tower's Health, Safety and Wellbeing Policy and Tower's Health, Safety and Wellbeing Framework and Statement.
- Monitoring compliance with Tower's health, safety and wellbeing framework, policies and relevant legislation.
- Holding the Executive Leadership Team to account for implementing Tower's Health, Safety & Wellbeing Policy and achieving targets.

- 3.3 Directors will endeavour to visit Tower sites at least once per year to assess Tower's Health, Safety and Wellbeing approach and ensure alignment with Tower's Health and Safety principles and objectives. Tower Limited Directors will be responsible for visiting New Zealand sites and Directors for Tower Pacific will visit Pacific sites. Directors for Tower Pacific may delegate authority where they are not resident in the relevant country to visiting New Zealand Executives or the relevant Country Manager (but will retain responsibility for decision making processes resulting from the visit). An annual schedule for visits will be drafted, discussed and agreed prior to each new financial year.

Executive leadership team

3.4 Tower's Executive Leadership Team is responsible for:

- Providing health, safety and wellbeing leadership by encouraging conversations about health, safety and wellbeing and taking proactive steps that are aligned with Tower's health, safety and wellbeing values, goals and vision.
- Identifying health, safety and wellbeing hazards and risks and implementing appropriate risk management strategies and systems.
- Ensuring adequate facilities are provided for the welfare, comfort and sanitation of anyone working from a Tower site.
- Determining and implementing health, safety and wellbeing targets and tracking Tower's performance to give effect to Board strategy.
- Monitoring and reporting on health and safety risks, hazards, incidents and mitigants and responding in a timely way to that information.
- Creating a culture of health and safety awareness and communicating with workers on health and safety matters.
- Ensuring appropriate worker engagement measures are in place.
- Identifying and allocating appropriate resources to health and safety management.
- Striving for continuous improvement of health and safety systems and processes.
- Monitoring the health and safety practices and standards of contractors and third-party providers to ensure alignment with Tower's objectives.
- Supporting employees injured at work to participate in rehabilitation programmes to facilitate the early return to work.

Health and Safety Advisors

3.5 The Health and Safety Advisors are responsible for advising the Board and Management on all health and safety matters. In addition, the Health and Safety Advisors must:

- Ensure that workers are provided with continuous education and training on health and safety matters.
- Oversee Tower's health and safety representatives, fire wardens, first aid officers and Health, Safety & Wellbeing Committees.
- Ensure that workers have an opportunity to express their views and contribute to decision-making processes relating to health and safety issues.
- Ensure comprehensive and appropriate reporting and investigation of health and safety matters to management and the Board.
- Manage Tower's relationship with WorkSafe, including in the case of notifiable events.

- In all other ways advise on compliance with relevant legislation, regulations and codes of practice.

Health, Safety & Wellbeing Committees

3.6 The Health, Safety & Wellbeing Committees are responsible for facilitating co-operation between Management and workers in relation to health, safety and wellbeing at work. Their key responsibilities are to:

- Assist in the creation and distribution of health, safety and wellbeing practices, procedures and policies.
- Represent workers in matters relating to health, safety and wellbeing.
- Provide feedback to the Health and Safety Advisors and management on health, safety and wellbeing practices from their area of the business and make recommendations to further enhance the health, safety and wellbeing of workers.

Workers

3.7 Tower workers must take reasonable care for their own health, safety and wellbeing and not act in a manner that intentionally jeopardises (or has a foreseeable risk of jeopardising) their own, or another person's health, safety or wellbeing.

3.8 Tower workers should proactively mitigate any risks that may affect their own health, safety and wellbeing, or the health, safety and wellbeing of others, as far as they are reasonably able to do so (both in respect of their "in office" and "at home" working arrangements). Such health, safety and wellbeing risks and mitigating actions may include, but are not limited to:

- eliminating physical hazards in the workplace.
- reporting (as soon as they are reasonably able) any actual or potential health and safety hazards, incidents, injuries or 'near-miss' incidents in accordance with reporting processes (see Beacon for more information).
- taking wellness leave to prevent contagion of an illness or to mitigate risk of worsening the worker's own health or wellbeing by continuing ordinary business activities at Tower.
- reporting incidents of harassment or bullying to their manager, the Health and Safety Advisors, or via the Whistleblower service (see Tower's Whistleblower Policy for more information).

3.9 Tower workers must comply as far as they are reasonably able with any reasonable instruction given by Tower to allow Tower to comply with relevant legislation.

3.10 Tower workers must also co-operate with Tower's health and safety practices and procedures set out in this policy or any other policy issued from time to time. Policies include Tower's Code of Ethics and the Diversity, Equity and Inclusion Policy.

- 3.11 Tower encourages all workers to participate in the conversation about health, safety and wellbeing. Any ideas for improvement to Tower's health and safety policies, processes or practices should be provided to Tower's Health and Safety Representatives, Committee or the Health and Safety Advisors.

4 Reporting

- 4.1 The Board will receive and consider a monthly health, safety and wellbeing report from Management outlining health, safety and wellbeing risks, incidents, activities and any other relevant information.
- 4.2 Tower's Executive Leadership Team will ensure that Tower's vision for health, safety and wellbeing is communicated prominently and strongly across Tower.
- 4.3 Tower's Executive Leadership Team will also ensure that the value of Director site visits are promoted at Tower and any relevant findings reported back to the relevant work area.
- 4.4 Reporting against the Board's Risk Appetite Statement, including health and safety risk, is provided to the Board Risk Committee as part of the regular Risk & Compliance Report.

5 What will success look like?

- 5.1 Our measures for success are:

Critical risks and risk appetite

- Critical risks and treatment plans for mitigation are clearly defined.
- Critical risk descriptors align to key areas of health and safety, namely Leadership, Worker Engagement and Risk Management.
- Everyone knows what the critical health and safety risks are at Tower and their role in health and safety matters, and there is business wide involvement in an annual review of Critical Health & Safety risks.
- All work-related incidents that result in fatalities, permanent disability, hospitalisation and/or time lost from work of one day/shift or more are recorded and reviewed against our low appetite for occurrences, as documented in the Risk Appetite Statement.

Health and safety culture

- Health and safety inductions are completed within the first weeks of commencing employment/engagement with Tower.
- Work from Home (**WFH**) desktop assessments completed for employees with permanent or hybrid WFH arrangements upon commencement and reviewed at least annually.

- Evidence of enhanced conversations, communication and education regarding health and safety, which will be evaluated through engagement surveys and feedback through Health & Safety Representatives.
- Alignment and embedded to Tower's Values, the performance management framework, the leadership tools, and the self-leadership approach.

Overlapping health and safety responsibilities

- Having a risk map and framework that clearly sets out how Tower works with its suppliers and contractors on keeping safe and staying healthy.
- Responsibilities and accountabilities of each party for every task are clearly defined.
- Evidence of collaboration with suppliers to ensure the safety of Tower customers and sharing information about emerging health and safety risks.
- Ensuring regular Health and Safety audits are carried out on all Tower sites.

The right training and support to promote wellbeing of all our people

- Having a shared understanding of mental health and wellbeing and understanding why it's important to think and talk about wellbeing at work.
- Training programmes that include practical learning regarding how we can enhance our wellbeing culture.
- An overall improvement in employee wellbeing demonstrated through employee KPIs and employee feedback.
- Connecting to our leadership expectations and rituals, providing leaders the tools to regularly monitor the wellbeing of teams, with appropriate training and knowledge to act appropriately to any issues or risks identified.
- Encouraging workers to speak up about mental health and wellbeing.
- Promoting support services.

6 Definitions

- 6.1 Terminology used in this Policy should be read consistently with the relevant legislation.
- 6.2 'Relevant legislation' means the legislation listed in Section 1.2.
- 6.3 'PCBU' is a Person Conducting a Business or Undertaking and means Tower in the context of this Policy. It is further defined in the Health & Safety at Work Act 2015 (New Zealand).
- 6.4 'Officer' includes Directors of Tower and any other person occupying a position that allows the person to exercise significant control over the management of Tower. For Tower's purposes, an 'Officer' is:

- Tower Directors.
- Tower Executive Leadership Team who exercise significant control over the management of Tower.
- Boards of Directors of Tower's subsidiaries.
- Fiji Leadership Team.
- Country Managers.

6.5 'Director' means a Director of Tower.

6.6 'Tower' means Tower Limited and its subsidiaries and related companies.

6.7 'Worker' is an individual who carries out work in any capacity for Tower, and for the purposes of this Policy includes employees, contractors, subcontractors, trainees, those on a work trial and volunteers.

6.8 'WFH` refers to employees working from home.

7 Review

7.1 This Policy will be reviewed every two years or sooner if changes to legal, regulatory or business requirements occur that require an earlier or more frequent review.

Health, Safety and Wellbeing Policy Statement

Our Aim:

We all complete our work day and return home safe and well.

Our Vision:

Health and safety is paramount at Tower, and everyone contributes towards a safe working environment. We strive for a positive safety culture and continuous improvement of the health, safety and wellbeing of our workers.

Our Commitment:

Tower is committed to a healthy and safe working environment for employees, contractors, visitors and any other third party.

All health and safety legislative requirements will be met by continually building a positive and pro-active health and safety culture. We will provide a robust health and safety management system that is maintained and regularly reviewed for continuous improvement.

We will achieve this by:

- Ensuring all leaders are competent and accountable for health, safety and wellbeing.
- Implementing policies and procedures that meet legal obligations and protect the health, safety and wellbeing of those to whom we owe a duty of care.
- Identifying and assessing health and safety hazards, impacts and risks from our activities and services.
- Providing adequate facilities for the welfare, comfort and sanitation of anyone working from a Tower site.
- Setting health and safety objectives, targets, identify risks, and demonstrating continuous improvement.
- Developing and introducing plans and strategies to ensure we achieve agreed objectives and manage risks.
- Monitoring, reviewing and reporting our performance measured against a set of objectives and targets.
- Providing information, training and supervision to employees and other suppliers and their workers, ensuring they are competent to do their jobs safely.
- Accurately reporting and recording all incidents, and ensuring investigations identify root causes and there is accountability for corrective actions.
- Actively managing the safe return to work of any employee who has suffered a work-related injury or illness.
- Taking responsibility for safety and wellbeing and making sure our actions or inactions do not place us or anyone else in harm's way.

Signed:



Date: 17 July 2024

Chief Executive Officer: Blair Turnbull