



Environmental, Health and Safety Management Plan

March 2024

This document was approved by Hudson Shipping Lines' Board of Directors and is publicly available on our website.

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1 OVERVIEW

This Environmental, Health and Safety Management Plan (“EHS Management Plan”) shall apply to all sites and offices of Hudson Shipping Lines, Inc. (“Hudson”) and any other sites under management by the company, along with any project involving its employees.

1.1 Purpose

The purpose of this EHS Management Plan is to establish and maintain an effective safety system. Hudson has implemented a Safety Management System so that it can achieve a consistently high standard of safety performance. In addition, it serves to ensure Hudson meets the obligations of its Health and Safety policy and the relevant health and safety rules and regulation of the jurisdictions within which it operates.

1.2 Review

Hudson reviews this plan in full on an annual basis. More frequent reviews will take place in response to organizational and legislative changes. Management will undertake these reviews with all changes being communicated to the contract manager after implementation.

1.3 Document Control

This EHS Management Plan along with all other procedures and forms owned by Hudson shall be released as controlled documents. These documents shall be authorized by the supervisor/Manager or nominee in their absence.

It will be managed under the quality control system maintained by Hudson. Un-controlled copies of any documents are not authorized for distribution or use within Hudson.

2 HEALTH AND SAFETY POLICY

Hudson is committed to protecting the health, safety and welfare of our employees, clients and the communities where we operate.

Our Health and Safety Policy sets out the standards we aim to achieve throughout Hudson's group activities, wherever they are undertaken. It is our aim to achieve a safe and controlled working environment which is free of work-related accidents and ill-health and to this end we will pursue continuing improvements from year to year. We will not compromise environmental, health and safety values for profit or production.

It is Hudson's priority to ensure that:

- An effective Health and Safety culture is promoted and maintained to ensure that all workplace hazards are identified, associated risks are assessed and appropriate control measures are introduced to control the risks.
- Health and Safety systems are monitored and reviewed to take into account changing conditions and circumstances in the workplace.
- Employees are consulted on all Health and Safety issues that involve them and their working conditions and environment.
- All relevant documentation relating to Health and Safety issues are made available to employees and their representatives.
- Tasks requiring specific qualifications, skills or experience are only undertaken by those competent to do them.
- All employees are appropriately trained, supervised and provided with adequate information to undertake their duties safely.
- All accidents, incidents and near misses are reported to a supervisor; the circumstances of the accident, incident or near miss are investigated and recorded and appropriate measures are taken to prevent a reoccurrence.

3 ROLES AND RESPONSIBILITIES

In order to ensure that the EHS Management Plan is successfully managed within the organization, the following responsibilities have been allocated.

3.1 Management

The Manager/supervisor and the management team accept overall responsibility for the effective management of the environment and workplace health and safety.

3.2 Duties of Managers/Supervisors

Managers/supervisors at all levels are responsible, within the scope of their authority for ensuring that:

- The tasks required for the successful implementation of the company's risk management programs are undertaken.
- Employees are consulted on workplace health and safety matters, which may affect them.
- Communication on occupational, health and safety issues is promoted as a normal component of work.
- All plant, substances and work systems used are suitable for their intended purpose in the workplace and meet safety requirements.
- Adequate training, information, instruction and supervision are provided so that work is conducted safely.
- Contractors and visitors are made aware of safety procedures.
- Immediate and appropriate steps are taken to investigate and rectify any risks to health and safety arising from work activity.
- The attention of senior management is promptly brought to any relevant health and safety issues.
- All accidents and near misses are properly recorded and reported, and an investigation is carried out to determine causal factors.
- Safe access to, and egress from the workplace is maintained at all times.

3.3 Duties of Employees

Employees are responsible for:

- Carrying out their duties in a manner which does not adversely affect their own health and safety or that of others.
- Cooperating with measures introduced in the interests of workplace health and safety.
- Undertaking any training provided in relation to occupational, health and safety.
- Immediately reporting all matters which may affect workplace health and safety, to their supervisor.
- Correctly using any information, training, personal protective equipment and safety devices provided.
- Refraining from intentionally misusing or recklessly interfering with anything that has been provided for health and safety reasons.
- Undertaking only those tasks for which they have authorization and/or the necessary training, and for which all necessary safety arrangements are in place.

3.4 Contractors and Visitors

All Contractors and sub-contractors engaged to perform work on the premises or locations are required as part of their contract to comply with the occupational, health and safety policies and procedures of Hudson and to observe directions on health and safety from designated employees of Hudson.

Failure to comply or observe a direction will be considered a breach of the contract and sufficient grounds for termination of the contract.

All visitors are expected to follow occupational, health and safety policies and procedures whilst on the premises and not to adversely affect their own health and safety or that of others.

3.5 First Aid

Hudson will maintain suitable numbers of first aid personnel to deal with minor accidents and emergencies at the workplace. These personnel will have sufficient training and qualification in accordance with statutory requirements. The identities of first aid personnel shall be displayed throughout the workplace.

3.6 Emergency Procedures

Hudson shall at all times follow all emergency and evacuation procedures issued by the client.

3.7 Information and Communication

Hudson will ensure that all suitable and relevant information relating to the environment, health, safety and welfare at the workplace is communicated to all staff. Notices shall be displayed throughout the workplace.

Toolbox meetings containing information and discussions on health and safety shall be held regularly. Prior notice shall be given on the agenda and minutes shall be displayed in the workplace.

4 MANAGEMENT OF RISK

Hudson uses risk management techniques to ensure all workplace hazards and their associated risks are appropriately identified, assessed and controlled.

This is achieved by:

- Establishing a register of hazards and associated risks.
- Undertaking all risk management with consultation from the work force.
- Training all employees in the use and application of all controls introduced for each identified risk.

The following risk management strategies shall be used within Hudson:

- Controlling of workplace access.
- Hazard Identification.
- Hazard Control.
- Emergency Assembly Area.
- Hazardous Substance Management.

4.1 Hazard Identification

Hudson has in place a structured hazard identification system that reviews workplace safety systems on a regular basis and to facilitate the reporting of risks to health and safety. Management and employees shall be trained to identify and report hazards. The use of the Work Safe “Think Safe SAM” technique is encouraged prior to each task where hazards are Spotted, Assessed and Managed.

All areas of work shall be risk assessed with the hazards entered into the Hudson risk register. This risk register shall be reviewed annually or after any incident or injury.

As a part of the hazard identification system, any hazard report forms supplied by the client shall be used at all times.

The client shall be notified of all hazards. It is the hazard reporter’s responsibility to ensure that corrective actions are taken as soon as physically and practically possible to control the hazard and mitigate risk.

All controls put in place shall be reviewed after implementation to ensure that they have not given rise to any new hazards.

4.2 Hazard Control

Hudson shall evaluate the level of risk associated with each hazard. The consequence and likelihood of harm occurring in relation to existing controls shall be determined.

Hudson shall control all risks to so far as reasonably practicable, once they have been identified. Hudson shall implement controls in the following hierarchy of hazard control:

- Eliminate the hazard
- Substitute the hazard for something less hazardous
- Isolate the hazard
- Implement engineering controls
- Implement procedures and training for safe work
- The use of Personal Protective Equipment

In addition to the hierarchy of control, Hudson shall:

- See that all controls are updated in the Risk Register
- See that all controls identified from an incident investigation are implemented
- Update position descriptions and responsibilities should such controls be identified in incident investigations
- Ensure controls have time frames attached to them for completion and implementation
- Ensure employees receive feedback about controls being implemented and consultation has taken place to ensure appropriate controls are being used

Hudson, after implementing controls, shall ensure that the controls are evaluated for effectiveness at a future time. This will ensure that the controls have not caused further hazards and that they have in fact reduced the consequence and/or likelihood of the hazard.

4.3 Emergency Assembly Area

Hudson shall abide by the emergency procedures and emergency assembly areas outlined by the client at all times.

4.4 Hazardous Substance Management

The handling, transport, storage and use of hazardous material shall be carried out in accordance with the standards of the client.

5 ACCIDENT AND INCIDENT REPORTING

5.1 Determining Root Cause

All accidents and incidents, including near misses, must be reported to the client and investigated as soon as possible. There are two major reasons for this. These are:

- To determine the true and accurate circumstances which led up, and contributed, to the unwanted event.
- To prevent the event occurring again, potentially with even greater repercussions.

The definition of an “Incident” is an unplanned or undesired event that results in damage injury or illness to a person, damage to plant or equipment or damage to the environment.

The definition of a “Near Miss” is an event that was unplanned or undesired that could have resulted in harm, e.g. items falling from height that land without injury or any damage.

The root cause is the true cause or causes of the event.

Identifying the root cause of an incident may be a relatively complicated process. Several coincidental causes making up a chain of causation factors may be identified, none of which alone may have resulted in the accident. The basic concept of accident prevention is that accidents can have several causes, each of which must be identified and controlled.

In order for the investigation to uncover the root causes of an incident and therefore have beneficial outcomes, the “Who” “What” “When” “Why” “Where” and “How” questions need to be asked. This can be achieved with the use of Time-Line and Root Causal Analysis tools.

5.2 Reporting to Statutory Authorities

Hudson shall comply with all reporting guidelines for incidents and injuries prescribed in the client’s Incident Management and Reporting Procedures at all times.

6 EHS CONSULTATION

The management of Hudson has the highest commitment to Environmental, Health and Safety (“EHS”) in the workplace. In order to demonstrate this, management shall:

- Communicate the EHS policy throughout the workplace
- Reviews the EHS policy regularly
- Management shall always be represented at meetings involving EHS issues
- Unsafe acts and/or conditions shall be rectified as soon as practically possible
- Where delays in rectification are expected, such situations shall be made safe immediately and the progress on full correction communicated to the staff on a regular basis
- Support all policies and procedures by leading by example
- Non-compliance by managers with safety policies and procedures shall result in disciplinary action being initiated
- The safety management plan is to be made available throughout the workplace
- Regular safety and area inspections within the workplace are to be conducted by the management team

6.1 Safety Meetings

Hudson requires that regular safety meetings and toolbox meetings be held with all employees. These will be held monthly or more frequently as deemed necessary.

Such meetings shall take the form of a short information sharing activity, discussions of short-term issues and concerns regarding health and safety in the workplace and finish with other non-safety related issues or work planning.

All meetings shall be documented. A copy is to be posted on a notice board where it can be accessed by staff and visitors with the original being retained in the office. Actions arising from the meetings shall be documented and displayed in the workplace with information being updated regularly.



7 GENERAL SAFETY REQUIREMENTS

7.1 Managing Non-Compliance

Employees of Hudson who fail to comply with the health and safety requirements of the company, or those who demonstrate consistently poor safety performance, shall be subject to disciplinary measures.

Sufficient training, explanation and assistance shall be given to all employees to ensure they fully comprehend what is required of them. However, neither management nor the employees will tolerate unsafe behavior and non-compliance with safety policies and procedures of Hudson.

The disciplinary procedure for health and safety issues shall follow the same format as the warning system used by Hudson for any disciplinary matter.

7.2 Personal Protective Equipment

Hudson is committed to protecting the health and safety of all employees by using a systematic approach of risk management. Where better methods of controlling risks are not feasible, Hudson is committed to the effective selection, use, care and maintenance of suitable personal protective equipment ("PPE"). Hudson shall ensure that all employees have full access to the appropriate personal protective equipment required to safely undertake their work.

All PPE used by Hudson shall comply with the local jurisdictional standards relevant to that item. Specific PPE shall be used in certain instances depending on the nature of the task being undertaken.

All employees and visitors shall conform to the requirements of the workplace as sign posted or enforced by management.

Training and information shall be supplied to all supervisors/managers and employees in the fitting, use and maintenance of PPE. Supervisors/Managers shall be responsible for supervising and enforcing the use of PPE. The effectiveness of the PPE selection shall be reviewed on a regular basis.



7.3 Plant, Equipment and Light Vehicles

Hudson is committed to providing and maintaining a safe place and safe systems of work. Since uncontrolled hazards associate with plant could have serious and even fatal consequences for our employees and visitors, Hudson regards the maintenance of and adherence to our safe systems of work for controlling risk as a safety critical element of its overall safety system.

Hudson is committed to ensuring that all plant, equipment and light vehicles are fit for their intended duty. No plant, equipment or vehicle shall be operated without the relevant license from the appropriate authority, unless under the supervision of a competent authorized person using a current log book or unless an appropriate internal assessment has been made and documented where no statutory licensing is required.

All plant, equipment and vehicles operated on a client's site shall have registration papers available, be kept in service and have up to date pre-start records available on request from the client.

7.4 Housekeeping

It is the responsibility of all employees and visitors to ensure appropriate standards of housekeeping are maintained at all times. This standard shall apply to all sites where Hudson employees are working, regardless of whether this involves the administration office or off-site areas.

To ensure compliance is maintained with housekeeping standards, each area shall be set at a high standard. The employees must then ensure this standard is maintained at all times, through utilization of such tools as photographs and inspection checklists to determine the appropriate and agreed standard.

Management shall carry out regular area inspections and audits to ensure the housekeeping stays at the required standard. Feedback to employees shall be given at toolbox meetings.

7.5 Fitness for Work

7.5.1 Drugs and Alcohol

Hudson shall adhere to all Fitness for Work policies and procedures of the client ensuring site entry breath tests are supervised and recorded and all employees comply with random drug screening requirements. Hudson shall undertake further drug screening for staff that has absences from work for longer than 3 months.

7.5.2 Fatigue

Hudson utilizes a working hours code of practice to assess potential occupational safety and health hazard factors and risks from workplace/industry working hours arrangements. Hudson plans and prepares working rosters that meet or exceed current industry best practice in the jurisdiction within which it operates.

For example, the rosters currently used in Western Australia include the following constraints:

- No person shall exceed 60 days of work in any 3-month period
- No person shall exceed 728 hours of work with Hudson in any 3-month period
- No person is to complete more than 14 consecutive shifts
- No person is to complete more than 8 consecutive night shifts

For its Western Australian workers, Hudson shall supply monthly records to the client showing the working hours of its employees through the Department of Mines and Industry Regulations Safety, levy hours reporting system. These shall be sent to the client's nominated representative as soon as practical at the completion of each calendar month.

7.6 Quality of Products and Services

At Hudson our commitment is to never compromise on the safety, compliance and quality of our products or services. This requires everybody to be engaged, to understand their responsibility and to be empowered to take action in order to protect our clients and their reputation.

Hudson commits to:

- Demonstrate our ability to consistently provide quality products and services that meet our client's requirements
- Foster quality working partnerships and build mutually profitable relationships with our clients through effective communications, quality feedback and resolution-based complaints management
- Ensuring all products and services meet or exceed the relevant local jurisdictional or International standard which governs its quality
- Drive continual improvement and innovation through well-defined measurements, best practices and auditing to assess continuing suitability of our products

7.7 Management of Change

Hudson utilizes a management of change system for all products or services that are introduced or improved through the lifespan of our contracts. Specific practices are in place to ensure the process is completed effectively. Our management of change system serves to ensure that all changes identified for will include an approved Risk Assessment and a copy of the change will be communicated to the client for approval.

8 EHS PROFORMANCE MONITORING

Hudson is committed to collecting the following data to measure EHS performance:

- Keep an up to date risk register
- Histories of exposures to hazardous substances
- Medical records
- Rehabilitation information
- Workers compensation records
- Training records
- Number of Incidents year to date and from inception to date
- Number of Lost Time Injuries month to date and from inception to date

8.1 Positive Performance Indicators

Hudson shall maintain a system of positive reporting indicators. The following items shall be reported to management on a monthly basis:

- Number and frequency of safety audits
- Number of reviews undertaken on the safety system and procedures
- Sick Leave Absences
- Histories of exposures to hazardous substances
- Medical records

8.2 Auditing the Safety Plan

The safety management plan of Hudson shall be subject to regular and ongoing reviews of progress, relevance and compliance. Audits of the safety management plan shall be conducted on an annual basis or sooner as required and be led by the supervisor/Manager.

During audit, the following documents shall be made available:

- Actions from previous audits
- Lead safety statistics
- Lag safety statistics
- Actions from incident investigations
- First aid records
- Sickness records
- Amount of hours worked

9 INDUCTION PROCESS

Hudson shall induct all employees and visitors as per the client's induction requirements.

9.1 Training Requirements

Hudson shall conduct a training needs analysis as to determine the training requirements for all employees. The basis of this analysis shall be determined with the use of Position Descriptions and the Hudson risk register.

9.2 Checking Competency

At Hudson, all employees shall demonstrate they are competent and can perform the required tasks safely and to the satisfaction of a suitably qualified specialist. In tasks with a high potential for injury, Hudson shall undertake their own documented assessment of a person's competency.

As a guide, competency assessments shall contain the following elements as a minimum. They shall also be signed and dated by both the assessor and assessee and a copy of the certification document retained by the company.

- Task or equipment description
- Information on licenses held (or other relevant qualifications)
- A checklist containing the essential elements to be demonstrated
- Comments section for assessor and assessee
- Items shall be marked as being Satisfactory with a tick or Un-satisfactory with a cross



10 EHS INSPECTIONS

Hudson shall undertake workplace inspections as outlined in the workplace inspection schedule. To ensure inspections are carried out in a structured manner and with documented results, the following items shall be adhered to:

- A formal documented workplace safety inspection shall be conducted in areas of the workplace and by people nominated in the inspection schedule
- The inspection schedule will be reviewed on an annual basis or as inspections and audits are added or removed from the schedule
- The inspection must be conducted randomly during the allocated period to ensure results are not tampered with (not directly after the workplace has been cleaned)
- Issues identified during the inspection will be referred to the supervisor for corrective actions
- A copy of the completed inspection shall be displayed in the workplace, tabled at weekly toolbox meetings and kept on file

Hudson shall develop a customized set of safety inspections that will be used to inspect the workplace.

10.1 Actions from Inspections

Hudson shall use their best endeavors to ensure that all hazards are identified during an inspection and that they are corrected as soon as physically possible. All actions shall be discussed at toolbox meetings.

10.2 Record Keeping

It is a requirement of Hudson that all inspections, results from audits and evidence of reviews completed are kept at the workplace for a minimum of five years.

Evidence of training and minutes of toolbox meetings shall be kept for as long as reasonably practically possible, but defiantly for a period of no less than five years.

11 ENVIRONMENTAL POLICY

Hudson is committed to sustainable environmental management and shall maintain and review measurable indicators to ensure its continued improvement in prevention and compliance with environmental regulations through the guiding principles of ISO 14001, Environmental Management Systems.

It is Hudson priority to ensure that:

- We conduct operations in compliance with relevant local environmental regulations, licenses and legislation
- Work with staff and clients to identify and manage environmental impacts
- We educate our employees and sub-contractors on their environmental responsibilities and ensure this is integrated into their work practices
- Minimize the use of “Raw” ingredients
- Prevent pollution to the marine environment adopting the, “Reduce, Reuse, Recycle” mantra
- Communicate openly with staff and clients about environmental issues, acting on concerns
- Seek continual improvement on our environmental performance of our company
- Report all environmental incidents or any potentially damaging incidents to the client as soon as practical

11.1 Waste Management

Hudson shall undertake all efforts to ensure their compliance with environmental obligations under the relevant environmental regulations for the jurisdictions within which it operates.

All waste shall be disposed of in the most environmentally sensitive way possible. If necessary for compliance, suitably qualified specialist contractors shall be engaged for disposal.

Training and information shall be provided to employees so that they are aware of waste management procedures and able to carry them out safely. Adherence to the principles outlined will apply to all areas where Hudson is working.