

Safety & Wellbeing Policy (AU & NZ)



Why is this important

1. The Safety & Wellbeing Policy is our commitment to the physical and psychological safety and wellbeing of our people.
2. This Policy is designed to provide clear expectations in relation to IAG's management of safety and wellbeing risks and operationalise our safety and wellbeing commitments outlined in Appendix A. This is to ensure our work activities are carried out safely and the safety and wellbeing of people who may be impacted by our work activities (e.g., contractors, customers, partners, suppliers, visitors and others in the communities in which we operate) are not put at risk.

Who this applies to

3. This Policy applies to all employees, contractors and Directors who work in Australia and New Zealand and who are engaged by Insurance Australia Limited, Insurance Australia Group Services Pty Limited, Insurance Manufacturers of Australia Pty Limited, IAG (NZ) Holdings Limited, IAG New Zealand Limited, CGU Insurance Australia Pty Limited, Swann Insurance (Aust) Pty Ltd, IAG Asset Management Limited, Ambiatia Pty Limited (effective 3 November 2021), and Insurance Australia Group Limited (effective 3 November 2021) (collectively referred to as **IAG**).

Requirements

Policies and procedures

4. The Safety & Wellbeing Team must ensure the continuous development of a documented and comprehensive health and safety management system, which includes policies, procedures, and/or systems for:
 - a) Proactively managing work-related safety and wellbeing risks.
 - b) Engaging and consulting with Workers to provide opportunities for Workers to have input into decisions affecting their safety and wellbeing at work.
 - c) Escalating and resolving safety and wellbeing issues.
 - d) Safety and wellbeing instruction, training and supervision, so that Workers have the necessary knowledge, skills and competency to safely undertake their roles.
 - e) An employee assistance program that is accessible by our people, and where possible our customers, to support their wellbeing.
5. People Leaders are responsible for ensuring the development and implementation of local safe work procedures that are consistent with IAG's health and safety management system.

Incident reporting and investigation

6. IAG has an obligation to ensure that the Regulator is notified immediately after becoming aware that a Notifiable Incident or Notifiable Event has occurred arising out of the conduct of our business, or at the Workplace.
7. People Leaders must follow up all reported incidents within 24 hours and conduct an incident investigation within 48 hours to identify and implement corrective actions to prevent incident reoccurrence. All actions must be recorded in IAG's safety and wellbeing incident reporting system.
8. Any Worker who observes or is made aware of a Notifiable Incident or Notifiable Event must notify the Safety & Wellbeing team as soon as possible via telephone and report it through IAG's safety and wellbeing incident reporting system.
9. Workers must report all other work-related hazards, injuries, illnesses and near misses within 24 hours to their People Leader and through IAG's safety and wellbeing incident reporting system.
 - a) IAG acknowledges that some hazards are sensitive, personal, and potentially cumulative and traumatic, such as psychosocial hazards associated with bullying and harassment. Hazards

which are not reported immediately should nonetheless be reported as soon as possible to facilitate early intervention and corrective actions and can also be reported using different channels outlined in IAG's consultation and issue resolution procedures.

Risk management

10. People Leaders must seek to:

- a) Proactively identify any risks and hazards that might impact the safety and wellbeing of people in the Workplace.
- b) Eliminate those risks or hazards by identifying appropriate risk-mitigation strategies and escalate where required.
- c) Where risks cannot be eliminated, seek to minimise those risks in accordance with the Hierarchy of Risk Control and IAG's work health and safety risk management procedures.
- d) Manage risks to the safety and wellbeing of a Worker who is performing Remote or Isolated work, including by developing a process to keep in regular communication with the Worker.
- e) Review risk controls whenever changes are made, a new hazard is identified, or if consultation indicates a review is necessary, and revise any risk controls which do not adequately control the risk.
- f) Assess and manage the impact on Workers' safety and wellbeing of any changes to their work. This includes the provision and maintenance of safe systems of work, plant and Structures, and the safe use, handling and storage of plant, Structures, and substances (as applicable), to ensure any risks to Workers' safety and wellbeing are eliminated or minimised as far as reasonably practicable.

11. All Workers have a responsibility under WHS Law to take care of their own health and safety at work. It is also every Worker's responsibility to ensure that their activities do not adversely affect the health and safety of other people – for example, their co-workers or any other people that they may come into contact with at work. Workers must also:

- a) Observe and cooperate with all safe work procedures, policies, rules, and instructions.
- b) Where required, use, or wear personal protective equipment, as far as reasonably able, in accordance with any information, training or reasonable instruction provided by IAG.
- c) Perform their work from an IAG Office, or other Workplace, approved by their People Leader, such as working from a home office.
- d) Review their Workplace for any hazards or safety concerns, including when they work from home or another work location, and raise these with their People Leader before commencing work or as soon as practical and through IAG's safety and wellbeing incident reporting system.
- e) Comply with any reasonable direction given by management for health and safety.
- f) Cooperate with IAG as required to enable compliance with WHS Law.

Consultation and participation

Under WHS Laws, IAG has an obligation to consult, co-operate and co-ordinate its activities with all other persons who have the same work health and safety duties in a particular scenario. IAG engages with workers and other duties holders (such as contractors and third parties) as appropriate, including through the Safety & Wellbeing team, in order to meet this obligation.

People Leaders and Workers may also have an obligation to consult, co-operate and co-ordinate in particular scenarios. In this regard:

12. People Leaders must consult with Workers reporting to them:

- a) To assist with identifying hazards and ways to manage risks and when reviewing risk controls.
- b) When proposing changes to work, including changes to how work is organised, workload, and work hours.
- c) During an incident investigation, to help identify appropriate corrective actions to be applied after a Workplace incident.

13. People Leaders must encourage and support employees who raise safety and wellbeing issues in accordance with IAG's consultation and issue resolution procedures. This includes issues raised in relation to victimisation, discrimination, harassment, bullying, leadership and the IAG culture.

14. People Leaders must, where requested, support the establishment and functioning of health and safety committees or other consultation arrangements at the Workplace.

15. When a Worker is performing work that is likely to impact the safety and wellbeing of other Workers or other people at or near the Workplace, they must consult, cooperate, and coordinate activities with each other to the extent necessary to ensure everyone's safety and wellbeing at work.

16. All parties to a safety and wellbeing issue must make reasonable efforts to achieve a timely, final, and effective resolution of the issue in accordance with IAG's consultation and issue resolution procedures.

Training and competency

17. People Leaders must:
- a) Supervise Workers under their control to the extent necessary to ensure they are satisfied that work is being performed safely.
 - b) Ensure Workers complete relevant safety and wellbeing learning in line with IAG's Learning Capability Framework.
 - c) Consult with Workers to identify additional learning needs.
 - d) Develop and facilitate job-specific safety and wellbeing learning, where required.
 - e) Maintain records for locally delivered safety and wellbeing learning.
18. Workers must:
- a) Complete a health and safety induction at an IAG Office prior to commencing work.
 - b) Complete all mandatory safety and wellbeing learning within the required timeframe, as well as any other job-specific learning that is necessary to protect them from risks to their safety and wellbeing arising from their work.

First aid and emergency management

19. Workers must follow the emergency procedures at the site and the instructions provided by emergency wardens and emergency services personnel during an emergency.
20. Workplace first aid officers must complete the relevant First Aid training course and ensure their qualifications are kept up to date.
21. Emergency wardens must complete the emergency management training arranged by IAG.

Contractor and visitor management

22. Contract Managers must manage all contractors in accordance with IAG's contractor and visitor management procedures.
23. Contractors on IAG premises must:
- a) Follow the security arrangements at the site, including signing in at reception where available.
 - b) Act in a manner that does not adversely affect their or others health, safety, or wellbeing.
 - c) Follow all directions from their IAG representative relating to health, safety, and security.
 - d) Follow the emergency procedures at the site.
 - e) Participate in an onsite induction unless accompanied at all times by an IAG representative.
24. Workers hosting visitors on IAG premises must ensure visitors are supervised at all times or provided with an onsite induction in accordance with IAG's contractor and visitor management procedures.
25. Where requested, contractors must also complete the contractor pre-qualification process and IAG contractor induction training before commencing work on IAG premises or at an IAG controlled site. They must also hold any relevant safety qualifications, licences or certificates required to perform their work.

Injury management

26. The Safety & Wellbeing Team will ensure:
- a) Employees are provided with appropriate injury management, rehabilitation and return to work programs following a workers' compensation or rehabilitation claim.
 - b) Employees are provided with relevant information about workers' compensation or rehabilitation claims and injury management, including their rehabilitation rights and obligations.
 - c) The confidentiality and privacy of employee's personal information relating to a workers' compensation or rehabilitation claim is maintained in accordance with applicable legislation.
27. People Leaders must seek to provide suitable work when an employee is able to return to work, which is the same as or equivalent to the work being performed at the time of the injury, in accordance with statutory obligations.

28. People Leaders must also maintain regular contact with an injured or ill employee and make sure return to work and rehabilitation plans remain safe and appropriate.
29. Employees must participate in return to work and rehabilitation planning and return to work as soon as possible following an injury, and report any health, safety or wellbeing concerns arising from or relating to their rehabilitation or return to work.

Roles and Responsibilities

30. The responsibilities in relation to this Policy are set out in the table below:

Position	Responsibilities
IGAG Board	Exercise due diligence in accordance with their statutory obligations under applicable WHS Laws and oversee safety and wellbeing at IAG.
Officers	Exercise due diligence in accordance with their statutory obligations under the applicable WHS laws. Officers may also have other responsibilities outlined in this Policy.
IGAG Group Executive People, Performance and Reputation (Policy Owner)	<p>Management accountability for IAG's Safety & Wellbeing Policy.</p> <p>Make sure this Policy and any changes to it are fit for purpose and appropriate.</p> <p>Make sure the appropriate experts have provided advice about this Policy's subject matter.</p> <p>Make sure the appropriate experts are monitoring the environment and the appropriate people are ensuring this Policy is being kept up to date.</p> <p>Make sure those drafting this Policy have met the requirements of the Group Policies and Procedures Framework.</p> <p>Agree with the Approver how often this Policy must be reviewed and make sure it is reviewed at least every two years unless a different time period is specified to meet regulatory or legislative requirements.</p> <p>When this Policy is being reviewed, make sure that the reviewer:</p> <ul style="list-style-type: none"> engages with Group Risk, consults with relevant stakeholders, recommends changes to this Policy where appropriate, and updates any related Documents if required. <p>Approve or reject any minor administrative changes to this Policy.</p> <p>Make sure that any changes to this Policy are well communicated (including to regulators if required).</p> <p>Give assurance to the Approver at least annually that this Policy is adequate and effective</p>
Group Leadership Team (Policy Approver)	<p>Approve or reject the Policy and any changes to it, which are not minor administrative changes, making sure it is adequate and appropriate.</p> <p>If appropriate, direct the Policy Owner to make any amendments that the Approver thinks are necessary.</p> <p>Approve or reject any exemptions to the Policy requested (in accordance with the Risk Management Strategy, where applicable).</p> <p>Receive assurance annually from the Owner that the Policy is adequate and effective.</p> <p>Monitoring the effectiveness of this Policy (only applicable where there is specific and regular reporting to the Board on the content of the Policy).</p> <p>Support People Leaders to fulfil their health and safety responsibilities and accountabilities within their area of responsibility.</p>
People Leaders	Make sure they are informed and understand their health and safety responsibilities and accountabilities.
IGAG Workers, including employees and contractors	Take reasonable care for their own safety and the safety of others by following this Policy and complying with any reasonable instructions, policies, procedures, or guidelines in relation to health and safety.
Safety and Wellbeing Specialists	<p>Provide advice on safety and wellbeing matters and legislative obligations and assist with the development, implementation and monitoring of this Policy and the health and safety management system.</p> <p>Suggest amendments to this Policy.</p>

Breaches

31. If you breach this Policy, IAG may take disciplinary action against you. This will depend on the circumstances, including whether your breach is deliberate, how serious it is and if you have done it before. Disciplinary action could include a warning, dismissal, or IAG ending its business relationship with you.

32. If you breach the WHS Law, you might face criminal or civil liability.
33. If you become aware of a breach of this Policy, notify your People Leader, and report the incident through IAG's safety and wellbeing incident reporting system or the Safety & Wellbeing Team.

Definitions

34. In this Policy:

Term	Definition
Contract Manager	The contractor relationship manager or IAG staff member/s responsible for engaging and/or supervising a contractor to complete works on behalf of IAG.
Hierarchy of Risk Control	A system for controlling risks in the Workplace. Eliminating the hazard and risk is the highest level of control in the hierarchy, followed by reducing the risk through substitution, isolation, and engineering controls, then reducing the risk through administrative controls. Reducing the risk using protective personal equipment is the lowest level of control.
Notifiable Incident or Notifiable Event	Incidents or Events that are required to be notified to the Regulator under WHS Law, and includes without limitation: <ul style="list-style-type: none"> • the death of a person, • a 'serious injury or illness', or • a 'dangerous incident'.
Officer	A person or who occupies a position that allows them to exercise significant influence over the management of the business or undertaking and any person who occupies a specific position that is included in the legal definition of officer. If a person is responsible only for implementing decisions, they are not considered an officer.
People Leader	Any employee who has others reporting to him or her or is responsible for others. This includes employees, other Workers and contractors reporting to them either permanently or temporarily.
Regulator	The relevant work health and safety authority in each jurisdiction in which this Policy is in force, under the relevant WHS Law.
Remote or Isolated work	Work that is isolated from the assistance of other persons because of location, time or the nature of the work.
Structure	Anything that is constructed, whether fixed or moveable, temporary or permanent, and includes buildings, masts, towers, framework, pipelines, transport infrastructure and underground works (shafts or tunnels).
WHS Law	Means the relevant work health and safety legislation applicable in each jurisdiction in which IAG operates in Australia, and the Health and Safety at Work Act 2015 in New Zealand.
Worker	Includes any person who works for IAG in any capacity, including employees, contractors or subcontractors and their employees, labour hire Workers, outworkers, apprentices or trainees, students gaining work experience and volunteers.
Workplace	A workplace is a place where work is carried out, or is customarily carried out, and includes any place where a Worker goes, or is likely to be, while at work. For example, a workplace includes IAG Office buildings, a tool of trade vehicle, and while a Worker is working from home.
Work Health & Safety Management System (WHSMS)	That part of the overall management system that includes organisational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining the Safety & Wellbeing Policy, and managing the risks associated with IAG's operations.

Contacts for questions and more information

35. This Policy is owned by the Group Executive, People, Performance and Reputation. If you have any questions or would like more information about this Policy, you should contact the Executive General Manager, Business Partnering AU/Asia.

Policy information

Effective from	16 June 2021
Owner	Group Executive, People, Performance and Reputation
Approver	Group Leadership Team
Next review due	16 June 2023
Entities this applies to	Insurance Australia Limited, Insurance Australia Group Services Pty Limited, Insurance Manufacturers of Australia Pty Limited, IAG (NZ) Holdings Limited, IAG New Zealand Limited, CGU Insurance Australia Pty Limited, Swann Insurance (Aust) Pty Ltd, and IAG Asset Management Limited.
Opting into this Policy	IAG subsidiaries may opt into the scope of this Policy by advising the Executive General Manager, Business Partnering AU/Asia, in writing that the entity is seeking to use and rely on this Policy and will comply with the obligations set out in this Policy. By agreement with the Executive General Manager, Business Partnering AU/Asia, the scope of this Policy will be extended to the subsidiary as requested and a note will be included in this Policy of the updated scope.
Related documents	<p>Documents to be read in conjunction with this Policy are:</p> <ul style="list-style-type: none">• WHS Roles, Responsibilities & Legislative Obligations Procedure (AU)• Safety and Wellbeing Roles and Responsibilities Procedure (NZ)• WHS Risk Management Procedure (AU)• Hazard Identification, Risk Assessment and Control (HIRAC) Procedure (NZ)• WHS Incident Reporting and Investigation Procedure (AU)• WHS Consultation and Issue Resolution Procedure (AU)• WHS Training and Induction Procedure (AU)• Training and Supervision Procedure (NZ)• Management of First Aid Procedures (AU)• Contractor and Visitor Management Procedure (AU)• PPE Guidelines (AU)• PPE Procedure Guidance (NZ)• ACC Employee Checklist (NZ) <p>For a complete list of health and safety management system documents, refer to:</p> <ul style="list-style-type: none">• Australian Policies, Procedures and Guidelines.• New Zealand Safety & Wellbeing Plans and Policies.
Policy operation	This Policy summarises some of the rights and obligations which are created by the applicable legislation and is not intended to go beyond the legislation. This Policy is not a term of any contract, including any contract of employment and does not impose any contractual duties, implied or otherwise, on IAG.

Document history

Version	Date	Amended by	Details of amendment
1.0	16 June 2021	Safety & Wellbeing Team	Creation of a combined Australia and New Zealand Safety & Wellbeing Policy.
1.1	3 November 2021	Safety & Wellbeing Team	Ambiata Pty Limited and Insurance Australia Group Limited added to policy scope in Section 3 - Who this applies to.

Appendix A

Safety & Wellbeing Policy Commitments

IAG is committed to the provision of healthy and safe Workplaces, including through:

- a) Identifying hazards; eliminating or minimising risks; implementing effective risk controls; and promoting wellbeing at work.
- b) Engaging and consulting with employees and others affected by our business.
- c) Encouraging and supporting Workers to raise safety and wellbeing issues and working together to resolve them.
- d) Setting and reviewing objectives for the management of risks, including physical and psychosocial risks.
- e) Taking all reasonably practicable steps to eliminate or minimise exposure of our workers to infectious diseases.
- f) Fostering a culture where our purpose and values are lived each day and our people feel safe to perform at their best, safe to share diverse ideas and experiences and safe to speak up against unethical or inappropriate behaviour.
- g) Creating a mature and resilient culture of promoting safety and wellbeing.
- h) Developing, implementing, maintaining and continually improving a comprehensive, integrated and prevention-of-harm focused health and safety management system.
- i) Complying with relevant work health and safety legislation and other regulatory requirements placed upon IAG, and its employees, contractors, directors and agents.