Woolworths Group	Document Title **WHS Requirements for Principal Contractors**	Document No: SHE-Guide-SYS-008.7.2.1
		Revision No: 8.0
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Woolworths Property Group	Approved By: Jason Hajinakitas	Review Date: Apr 31

1. Purpose

The document outlines the Woolworths Group Property Division's Workplace Health and Safety (WHS) requirements for Principal Contractors.

2. Scope

This document is applicable to all Projects across the Woolworths Group Property Division. This document should be considered alongside the 15A WHS Legislation Contract Compliance Requirement for Principal Contracting (but not a Contract Services Agreement or Minor Works Contract).

3. Key Definitions

- **HRCW:** High Risk Construction Work
- **Principal Contractor**: Under the Model Work Health and Safety (WHS) Regulations (which support the WHS Act), a construction project is defined as any project that involves construction work where the cost is $250,000 ($350,000 is the trigger point in Victoria only) or more. The Principal Contractor is:
    1. The Person Conducting a Business or Undertaking (PCBU) who commissions the construction project (the client); OR
    2. A PCBU appointed by the client to be the Principal Contractor and authorized to have management or control of the workplace
- **PCBU**: Person Conducting Business or Undertaking
- **PC**: Principal Contractor
- **PPE**: Personnel Protective Clothing
- **Construction Work:** an activity connected with the alteration, repair, maintenance, demolition, or commissioning of a structure, including site preparation, assembly, and installation.
- **Site360**: Woolworths Group Contractor Safety Software system for all Contractor company registration, prequalification and safety inductions
- **SWMS:** Safe Work Method Statement
- **WHS**: Workplace Health and Safety

4. Roles and Responsibilities

Role	Responsibilities
Principal Contractor (PC)	● Complete WHS activities outlined within the 15A WHS Legislation Contract Compliance Requirement for Principal Contracting and this document. ● Actively participate in a (monthly or as requested) WHS meeting (alongside relevant Woolworths and other representatives of the Principal) prior to, during and upon completion of all construction works. ● Maintain all Principal Contractor company documents, licenses and insurances (within Site360) and ensure a system for the company documents, licenses and insurances or subcontractors (Site360 or some commensurate other). ● In collaboration with representatives of the Principal, make available and support the ongoing review of Construction Safety Management Plan and any other WHS required documents prior to, during and upon completion of all construction works. ● Develop and keep updated a Project WHS Risk Register prior to commencing works (and ongoing). ● Maintain a role/s responsible for site safety supervision. ● Conform to the requirements of the Woolworths Incident Management Standard and to the submission of regular WHS Performance Reporting. Conform to all other safety performance measurement and reporting as requested. ● Make available (at agreed completion) to the Principal all WHS records (for 2 years post completion of the project) and commit to a post construction safety evaluation. ● Consult, cooperate and coordinate activities in a manner that will eliminate or minimise WHS risk and / or advise the Principal of instances where this cannot be achieved. ● Provide, without cost, all normal access, facilities and amenities for the safe performance of all contracted works. ● Display the Principals Safety, Health and Wellbeing Policy and the Principals Incident Notification and Escalation Protocol.

Role	Responsibilities
	• In collaboration with Woolworths Representative, appoint a suitably qualified WHS Auditor (from the Woolworths Group External WHS Audit Panel).
Principal (Woolworths Group Property Division)	• Supervise the completion of WHS activities outlined within the WHS Legislation Contract Compliance Requirement for Principal Contracting and this document. • Formally appoint (and terminate) Principal Contractor. • Formally authorise and, where indicted, formally resume / revoke or terminate the management and control of a Construction Project from a Principal Contractor upon the agreed completion (ensuring all WHS records are retained for a period of 2 years post completion) or as required.
Development Manager (DM) / Project Manager (PM) of the Principal (Woolworths Group Property Division)	• In collaboration with the SH&W Partner, complete the review of the WHS Project Risk Register, WHS Construction Management Plan of Principal Contractor prior to (and ongoing) to the commencement of construction works (as per **10.1 Appendix: Principal Contractor WHS Construction Management Plan Review Checklist).** • Actively participate in a Site Safety Steering Committee (or some other WHS governance arrangement) prior to, during and upon completion of all construction works. • Check for approval of all Principal Contractor company documents, licenses and insurances (within Site360). • Review the requirement of SWMS review for HRCW performed by the Principal Contractor. • Review the requirement that Principal Contractors undertake all activities outlined within the WHS Legislation Contract Compliance Requirements and the WHS Requirements for Principal Contractors (this document). • Actively participate in the requirements of the Woolworths Incident Management Standard. • Complete WHS tasks as requested by the Principal Contractor. This includes site induction and the wearing of approved PPE (steel capped footwear, hard hat and, as required, glasses, gloves and hearing protection) and clothing (nil skirts or dresses) at all times.
SH&W Partner of the Principal (Woolworths Group Property	• Support the Woolworths Group External WHS Audit requirement. • Receive WHS reports and other safety performance measurements when required.

Role	Responsibilities
Division)	• In collaboration with the Principal Contractor, complete a project completion safety evaluation. • Comply with the requirements of the Woolworths Incident Management Standard. This may involve coordination of the Woolworths Incident Notification and Escalation Protocol. • Review the requirement that all company documents, licenses and insurances of Principal Contractor are verified within Site360.

5. WHS Requirements for Principal Contractors

An appointed PC is responsible for the safety of the entire Construction Project, including all subcontractors, visitors, and the coordination of simultaneous operations (for example: store fit-out building contractors and Supermarkets).
Their responsibilities are:

5.1 Pre-Works Planning / Site establishment

- Ensure that all activities outlined within the 15A WHS Legislation Contract Compliance Requirement and this document are completed prior to commencement of works (as per 10.1 **Principal Contractor WHS Construction Management Plan Review Checklist)** as well as during and upon completion of all construction works. This may require a prior submission of relevant WHS documentation (such as WHS Construction Management Plan) for review by the Principal and onboarding.
- Maintain all company documents, licenses and insurances within Site360 prior to commencement of works as well as during and upon completion of all construction works.
- Develop and keep updated a Project WHS Risk Register prior to commencement of works (and ongoing).

5.2 Construction, Site Control and other WHS Risk Management Duties

- Ensure that all activities outlined within the 15A WHS Legislation Contract Compliance Requirement and this document are completed during and upon completion of all construction works.
- Maintain all company documents, licenses and insurances within Site360 during and upon completion of all construction works.
- Develop and keep updated a Project WHS Risk Register.
- Regularly submit to the Principal, on a regular basis and format, WHS reporting that accurately outlines progress to agreed safety performance measurements (such as incidents, safety compliance activities undertaken, High Risk

Workshops planned / completed, corrective actions closed out etc) and agreement to share relevant lessons learned (via Safety Alerts etc).

- Maintain a role/s responsible for site safety supervision (the site must be managed and adequately supervised in order to maintain a safe and compliant working environment at all times).
- Comply with all Woolworths Group External WHS Audit requirements.
- Ensure every person working on the project is aware of their WHS Management Plan and of their right to inspect it before they start work.
- Install clearly visible signs at the site boundary that display their Principal Contractor's name and 24-hour contact telephone numbers prior to commencement of works.
- Emergency Procedures: Include clear actions for fire, medical emergencies, and other incidents. This should include a link to the site's emergency procedures document.
- Welfare Facilities: Include details on amenities and first aid provisions at all times.
- Maintain a role/s responsible for site safety supervision (the site must be managed and adequately supervised in order to maintain a safe and compliant working environment at all times).
- Facilities: Include and maintain adequate facilities, including toilets, drinking water, and washing areas.
- First Aid & Emergencies: Include adequate first aid resources and a clear, tested emergency plan.
- Consultation & Cooperation: Issue clear duties to consult with other PCBUs (subcontractors) on-site and for the coordination of simultaneous operations (for example: store fit-out building contractors and Supermarkets).
- Inductions: Provide for the requirement that every worker has completed their General Construction Induction Card and include site-specific inductions.
- Personal Protective Equipment (PPE): Minimum PPE requirements (appropriate for Construction Work) are to be established and enforced (including subcontractors and visitors).
- Traffic Management (on and off site): Manage risks associated with pedestrians and traffic in and around the workplace to protect workers and the public.
- Contractors Vehicles: Coordinate the parking of contractors vehicles. Include all site-specific traffic and pedestrian management risk controls within the Project WHS Risk Register (or a separate Traffic Management Plan) and aim to ensure that all contractors are effectively consulted and communicated (NOTE: Parking of contractors vehicles will not be allowed in the vicinity of any customer entrance or within loading docks upon agreed completion).
- Essential Services: Include information about underground or hidden services (electricity, gas, water) before any planned or reactive excavation begins.
- Ensure notification of Health & Safety Representative (HSR), Regulator and Union activity is duly reported to the Principal via regular WHS Reporting.
- Risk Management: Include procedures of methods for identifying, assessing, and controlling risks.

- Consultation: Include agreed methods for consulting with workers and WHS representatives.
- Comply with the performance and outcomes requirements of the Woolworths Group External WHS Audit Panel.

5.4 Post Construction / site de-establishment

- Make available (at agreed completion) to the Principal all WHS records (for 2 years post completion of the project.
- In collaboration with representatives of the Principal, complete a Post Construction safety performance evaluation.
- Any Contractors returning to site during liability periods will be required to conform to the access requirements of the site controller (noting that this may no longer be the Woolworths Property Division but some other Woolworths Division or another Principal Contractor). This includes the requirement for the Contractor to maintain currency to their Site360 qualification and to receive appropriate advice around induction, direction and site controller obligations.

6. Incident Escalation and Management Protocol

The scope of immediate incident reporting by the Principal Contractor (to representatives of the Principal) is as follows:

- All incidents / events that are deemed Dangerous / Serious or Notifiable.
- All High Potential (HiPo) Events.
- All personal injuries that occur as a result of an incident / event (physical or psychosocial in nature).

Principal Contractors are to report all incidents to their Woolworths Representatives immediately. In addition they are to monitor and communicate corrective action, close out and provide evidence to the Principal on a regular basis. Depending on the potential consequence of the incident, Principal Contractors may be required to complete a formal incident investigation (with report) and provide evidence of ‘lessons learned’ over time.

A copy of the Woolworths incident escalation and management protocol is to be shared with Principal Contractors by a Woolworths Representative.

7. External WHS Audit

The requirement for Woolworths Group External WHS Audit are outlined here:

<table>
<tr><td rowspan="2">Project Works Duration</td><td colspan="2">WHS Audit Requirement</td><td rowspan="2">Auditing Criteria</td></tr>
<tr><td>First Audit</td><td>Subsequent Audits</td></tr>
<tr><td>Less than 12 weeks</td><td rowspan="4">External WHS Audit to be completed within two (2) weeks of commencement of construction</td><td>Monthly</td><td>Appendix 2: Principal Contactor WHS Audit Tool</td></tr>
<tr><td>13-16 weeks</td><td rowspan="2">Principal Contractor and Principal to risk assess / agree on an WHS External Audit cycle</td><td rowspan="3">Appendix 2: Principal Contactor WHS Audit Tool as well as a review of evidence of:
- Regular safety inspections
- HRCW workshops
- Task observation to SWMS
- SWMS Reviews
- Permits Issued
- Interviewing workers
- Examination of new legislative requirements
- Examination of corrective action close outs
- Health surveillance and monitoring results
- Completed Inductions
- Safety requirements on subcontractors
- Plant Checklists</td></tr>
<tr><td>17-26 weeks</td></tr>
<tr><td>26 weeks and above</td><td>3 monthly</td></tr>
</table>

The External WHS Auditor is to be chosen from the Woolworths Group External / Independent Auditor Panel. The Principal Contractor is to issue all External WHS Audit Reports to the Principal SH&W Partner within five (5) business days from when the audit has been conducted.

The External WHS Auditor is to be qualified on Site360 and they must, **must, as a minimum** hold the following qualifications and experience:

- Diploma of Work Health and Safety (minimum level);
- Lead Auditor Certification (ISO 45001); and
- 5 years + experience in Commercial Construction.

Prior to commencement of any WHS External Audit, a 'check' should be completed to ensure the External WHS Auditor remains current on the Woolworths Group External WHS Audit Panel.

The Principal Contractor is to be also completing routine / regular safety inspections which will check, as a minimum:

- Housekeeping standards (level of rubbish, general cleanliness and maintenance of all site facilities)
- Safety and security of perimeter fencing, barriers and hoardings.
- Storage of plant, equipment, hazardous substances, tools and restriction / authorised accesses.
- Trench covers and floor cover edging (slip, trip and fall hazards).
- Suitability of emergency evacuation plans and emergency exits, site signage and separation of visitors from Construction works.

7. References and related documents

- Woolworths Group Incident Management Standard
- Woolworths Group Assurance Standard
- Woolworths Group Safety Health and Wellbeing Policy.

8. Version History

Date	Version	Key Changes
15/12/14	SHE-Guide-SYS-008.7.2.1 v7.0	Original
09/06/26	SHE-Guide-SYS-008.7.2.1 v8.0	Updated to comply with WHS Act and WHS Regulation requirements. Removal of dated prescriptive WHS risk control requirements. Removal of dated Injury Notification and Escalation Protocol. Removed audit report scorecard. Removed 2.0 Additional Requirement - Operational Sites. Removed Appendix 1 Mandatory Minimum PPE for Construction Zones, Appendix 2 Hoarding and Barricade System, Appendix 3 Minimum Audit

Date	Version	Key Changes
		Requirement (and recommended Auditor List), Appendix 4 Incident Reporting (including Pulse Incident / Injury Form). Added Appendix 10.1 Principal Contractor WHS Management Plan Review Checklist. Updated Incident Escalation Protocol to the requirements of the SH&W Portal (Donesafe). Updated the requirement for WHS External Auditors to be current and on the Woolworths Group External WHS Audit Panel.

Appendices

Appendix 1 - Principal Contractor WHS Construction Management Plan Review Checklist

The Principal Contractor WHS Construction Management Plan Checklist is to be reviewed and agreed by the Woolworths Group Property Division (via the Development Manager supported by the SH&W Partner) prior to the commencement of works by the appointed Principal Contractor.

(NB: Every project does require a new submission and are not rolled over from other projects or jurisdictions).

WHS Management Plan Checklist	Y	N	Comments
Project Name, Address and Principal Contractor Details documented?			
Names and contact details of persons with WHS responsibilities included?			
Arrangements to inform workers of the WHS Management Plan?			
Arrangements for consultation, cooperation and coordination with other PCBU's?			
Process for collecting, reviewing and monitoring SWMS for High Risk Construction Work performed by subcontractors?			
Emergency Plan and First Aid Arrangements documented?			
Site induction and training requirements outlined?			
Signage and Site Security measures specified?			
Schedule for regular safety inspections and External WHS Audits (including their nominated External Auditors) specified?			
Personal Protective Equipment requirements specified (including PPE for visitors)?			
Traffic & Pedestrian management (on and off site) measures specified?			

WHS Management Plan Checklist	Y	N	Comments
WHS Risk assessment requirements of purchased (or hired) Plant, Equipment, Machinery and Materials?			
Dangerous Goods and Hazardous Materials measures specified?			
Plant and Equipment measures specified?			
Incident Management (including investigation) processes specified and aligned to the Incident Management Standard?			
WHS External Auditing requirements specified?			
Day to Day Site Safety requirements specified (for example: noise, access controls, daily requirements, emergency evacuation planning, permits, risk assessments, Plant and Equipment LOTO, drugs and alcohol, fatigue etc)?			
Site360 Current Compliances current and up to date (including all subcontractors linked)?			
Are the workers' rights to stop work in situations presenting serious safety concerns specified?			
Is a Workplace Injury Management and Return-to-Work program specified?			
Are methods for identifying and controlling Psychosocial Safety hazards specified?			
Are calibration requirements for measuring and monitoring WHS devices (NATA or National Standards) specified?			
Are any other relevant (site specific) items specified?			