

**Smartpay Governance**  
**Principle 6 : Recognise and**  
**Manage Risk**

The Company has established a sound system of risk oversight and management and internal control.

**Useful links/further information:**

[Smartpay staff Handbook](#)

[Smartpay Health and Safety Manual](#)

[Smartpay DRP and BCP plans](#)

[Worksafe NZ](#)  
[Safe Work Australia](#)

Smartpay reserves the right to amend, update or withdraw its corporate policies without prior notice.

# Health and Safety Policy

21 October 2020

## Policy Statement

Smartpay is committed to maintaining a safe and healthy working environment for anyone working on Smartpay premises.

## Policy Purpose

The purpose of the policy is to reinforce Smartpay's commitment to:

- complying with current Health & Safety legislation
- ensure that anyone working within our business is provided with a safe working environment
- provide procedures for the rehabilitation of employees into the business following a period of absence
- provide structures and processes which deliver a consistent approach to Health & Safety through the business
- its core values and ethics
- provide guidance on the process to ensure compliance

## Definition

Occupational Health & Safety means organised efforts and procedures for identifying workplace hazards and reducing accidents and exposure to harmful situations and substances. It also includes training of personnel in accident prevention, accident response, emergency preparedness, and use of protective clothing and equipment.

## Application

Smartpay recognises that it is considered a 'Person Conducting Business or Undertaking' (PCBU) for the purposes of the current legislation in both New Zealand and Australia and therefore that it has responsibilities beyond just its employees; it is committed to ensuring that anyone working within its business is provided with a safe working environment and subject to our internal policies and procedures.

## Responsibility

Safety in the workplace requires mutual co-operation from management and employees.

## The Smartpay group of companies

Smartpay Holdings Limited, Smartpay Limited, Smartpay Australia Pty Limited and their associated companies are the PCBU for the purposes of the current legislation and have the primary duty of care to employees and workers.

## The Board

The Board is responsible for the oversight and review of risk management, which includes Health & Safety and requires senior management to ensure that Health & Safety management within the business is pro-actively and consistently managed.

## Senior Management

Senior Managers are committed to and responsible for ensuring that the appropriate policies and procedures are in place for identifying workplace hazards, reducing accidents and exposure to harmful situations and substances, for employee participation and representation in Health & Safety issues. They are also responsible for the education, training and development of all employees and workers to ensure they understand and work within this commitment and the respective governing laws.

## Managers, Supervisors and Health & Safety Officer

Managers, Supervisors and designated Safety Officers must keep accurate reporting and recording records. It is a requirement that all Managers or Supervisory staff be accountable, trained and competent in matters of Health & Safety within their area of responsibility.

## All workers

It is a requirement that all employees actively assist management in keeping the workplace clean and hazard free and to do everything within their power to create an injury free environment. All employees are encouraged to attend any meeting called for the purposes of discussing Health & Safety in the workplace.

All employees must report to their supervisor or manager any new hazards or potential hazards that may arise and to do all things possible to avoid accident or injury to themselves, their fellow employees or any other person.

All employees have a legal requirement to comply with the Health & Safety in Employment Act and must sign to acknowledge that they have read and understood the Company's Health & Safety documents. This is a condition of employment with Smartpay.

## Framework

All Health & Safety policies and procedures will be established in compliance with:

- NZ: Health & Safety in Employment Act 2015
- Australia: Safe Work Australia Act 2008

and their subsequent amendments, regulations relating to the Acts, Codes of Practice and all other safe operation procedures.

The Smartpay Health & Safety Framework will consist of:

- Health & Safety Manual
- Hazard Registers
- Accident investigation and reporting procedures
- First Aid and Fire evacuation procedures
- Policy on rehabilitation after a period of absence due to sickness or injury
- Improvement procedures
- Employee participation
- Induction and Training
- Safety equipment and personal protective clothing requirements
- Workplace inspections
- Review procedures and timetable
- Other procedures as the needs of the business and working environment dictate from time to time

## Reporting

Senior management will report to the Board all Health & Safety issues that arise in the workplace, including:

- Accidents reported
- New hazards identified
- New equipment or procedures implemented
- Changes in legislation and/or best practice guidance

## Review

Management is committed to continuously improve and review its Health & Safety procedures and will respond and adjust procedures as circumstances dictate on an ongoing basis. It's Health & Safety documentation will be audited regularly either by competent in-house staff or by an outside service provider.

This H&S policy will be reviewed every 3 years and in response to any relevant legislative or best practice guidance changes.

## Where to get more help

Smartpay has the following documentation which complement this policy:

- Health & Safety Manual and appendices
- Hazards Registers for each location
- Staff Handbook

It displays at its premises notices about First Aid, Fire procedures and other notices as required from time to time.

The senior management team, and the Health & Safety Officer can provide detailed advice on the implementation of this policy and associated procedures and practices.

## Policy authorised by the Board 21 October 2020



**For and on behalf of the Board**  
**Greg Barclay**