



# IAG Safety & Wellbeing Policy (AU & NZ)

## Why this is important

1. The Safety & Wellbeing Policy is our commitment to the physical and psychological safety and wellbeing (including health) of our people.
2. This Policy is designed to set clear expectations in relation to IAG's management of risks to safety and wellbeing, and operationalise the safety and wellbeing commitments outlined in Appendix A. This is to ensure work activities are carried out safely, and the safety and wellbeing of people who may be impacted by those work activities (e.g., contractors, customers, partners, suppliers, visitors, and others in the communities in which we operate) are not put at risk.
3. 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.

## Who this applies to

4. This Policy applies to all employees, contractors, directors, and Officers 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, Ambiat Pty Limited, and Insurance Australia Group Limited (collectively referred to as IAG).
5. IAG subsidiaries may opt into the scope of this Policy by advising the Executive General Manager, Group Business Partnering, 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, Group Business Partnering, 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.
6. It applies whenever you act for or on behalf of IAG.

## Requirements

### Policies and procedures

7. 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 identifying work-related safety and wellbeing risks, and ensuring these risks are appropriately managed, so far as reasonably practicable.
  - b) Engaging and consulting with Workers (as per the Definitions section) to provide opportunities for Workers to have input into decisions affecting their safety and wellbeing at work.
  - c) Escalating and resolving concerns raised in respect of safety and wellbeing.
  - d) Safety and wellbeing instruction, training, and supervision, so that Workers have the necessary knowledge, skills, and competency to safely undertake all aspects of their roles.
  - e) Reporting and insights that is provided to the Employing Entity Boards (NZ, IMA, IAGS), Group Leadership Team and NZ Leadership Team Risk Committee, in relation to IAG safety and wellbeing matters in compliance with this Policy.
  - f) An employee assistance program that is accessible by our people to support their wellbeing.

8. 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

9. IAG has an obligation to ensure that the relevant Regulator is notified immediately after becoming aware that a Notifiable Incident or Notifiable Event (as per the Definitions section) has occurred arising out of the conduct of our business, or at the Workplace.
10. 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 through IAG's safety and wellbeing incident reporting system.
11. Workers must, within 24 hours, report all other incidents and work-related hazards, injuries, discomfort, illnesses and "near misses" to their People Leader and through IAG's safety and wellbeing incident reporting system.
  - a) IAG acknowledges that some hazards are sensitive and potentially cumulative and traumatic, such as psychosocial hazards (for example, hazards such as Workplace bullying or sexual harassment). Hazards should 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.
12. 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.

## Risk management

13. All Workers have a responsibility under Workplace Health and Safety (WHS) Law to take reasonable care of their own health and safety at work. It is also every Worker's responsibility to take reasonable care to ensure that their actions (or omissions) while at the Workplace (or otherwise undertaking work-related activities) do not adversely affect the health and safety of others— for example, their co-workers or any other people that they may come into contact with while at work.
14. Workers must:
  - b) Observe and cooperate with the IAG Safety and Wellbeing Framework, and all policies (including this Policy), procedures, rules, directions, and instructions;
  - c) Where directed or otherwise required, use, or wear personal protective equipment, in accordance with any information, training, or reasonable instruction provided by IAG;
  - d) Perform their work tasks from an IAG office, or other Workplace, approved by their People Leader, such as working from a home office, and in accordance with any specific directions or requirements provided by their People Leader;
  - e) Regularly review their Workplace for any identifiable hazards or safety concerns, including when they work from home or another work location. This includes completing the Work from Home Checklist at least annually or otherwise, either upon request from their People Leader or upon any material change to the location or configuration of their remote work environment.
  - f) Where a hazard or concern is identified, raise these both with their People Leader before commencing work (or as soon as practical), and through IAG's safety and wellbeing incident reporting system;
  - g) Comply with any reasonable direction given by management for health and safety; and
  - h) Co-operate with IAG as required to enable compliance with WHS Law.
15. People Leaders must, as far as reasonably practicable, also:
  - a) Proactively identify any risks and hazards that might impact the physical or psychological safety and wellbeing of people in IAG Workplaces. This includes for example, when Workers are working from home, undertaking field work or training, and when attending work-related functions or events.
  - b) Eliminate those risks or hazards by identifying and implementing appropriate risk-mitigation strategies and escalate (to first line risk), where required.

- c) Where risks cannot be eliminated, minimise those risks by implementing appropriate controls 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, not only to maintain regular communication, but to ensure that appropriate risk assessments are performed in respect of the remote/home work environment etc.
- e) Review risk controls whenever changes are made, a new hazard is identified, or if consultation indicates a review is necessary, and proceed to revise or replace any risk controls as needed to effectively control the risk.
- f) Assess and manage the impact on Workers' safety and wellbeing of any changes to the nature of or method in which any manual aspect of their work is carried out. 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 that may arise from such change are eliminated, isolated, or otherwise minimised as far as reasonably practicable.

## Consultation and participation

16. 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. To meet this obligation, IAG engages with Workers and other duties holders (such as contractors and third parties) as appropriate, including through the Safety & Wellbeing team.
17. In addition to the duties otherwise outlined in this policy, People Leaders and Workers may also be required from time to time to consult, and to co-operate and co-ordinate activities with others, including but not limited to health and safety representatives, in particular scenarios, for example:
  - a) To assist with identifying hazards and ways to manage risks, arising from work being performed;
  - b) When making decisions in relation to ways to eliminate (or minimise) those risks (including when reviewing risk controls and/or Workplace facilities);
  - c) When proposing changes to work that may affect the health and safety of Workers, (including but not limited to changes to how work is performed or organised, workload, work hours); and
  - d) When making decisions about procedures for:
    - i. consulting with Workers;
    - ii. resolving health and safety issues in the Workplace (including for example, appropriate corrective actions to be applied after a Workplace incident);
    - iii. monitoring the health of Workers, or Workplace conditions;
    - iv. providing relevant training and information to Workers.
18. For the purposes of the above, People Leaders must also encourage and support Workers to raise safety and wellbeing issues in accordance with IAG's consultation and issue resolution procedures. This includes issues that Workers may wish to raise in relation to matters such as victimisation, discrimination, harassment (including sexual harassment), Workplace bullying, or any other concerns with respect to the Workplace, or the IAG culture.
19. People Leaders must, where requested, support the establishment and functioning of health and safety committees and/or other consultation arrangements at the Workplace.
20. All persons involved in or otherwise affected by 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

21. Workers must:
  - a) Complete a safety and wellbeing induction with their People Leader or their representative to ensure they know what to do in an emergency, how to report safety and wellbeing incidents and are familiar with their place of 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 ensure, so far as reasonably practicable, they are protected from risks to their health, safety and wellbeing arising in relation to the work activity.

22. People Leaders must:

- a) Supervise their Workers to the extent necessary to ensure they are satisfied that their Workers have received adequate training and that work tasks are being performed in a safe and effective manner at all times.
- b) Consult with Workers to identify additional learning needs.
- c) Ensure Workers complete all relevant safety and wellbeing learning that is identified from time to time as relevant to their position or tasks being performed, in line with IAG's Learning Capability Framework.
- d) Develop and facilitate job-specific safety and wellbeing learning, where required.
- e) Maintain adequate records of completion for locally delivered safety and wellbeing learning.

### First aid and emergency management

23. Workers must follow the emergency procedure and evacuation plan for the site, and the instructions provided by emergency wardens and emergency services personnel during an emergency.

24. Workplace first aid officers must complete the relevant first aid training course and ensure their qualifications are kept up to date.

25. Emergency wardens must complete the emergency management training arranged by IAG.

### Contractor and visitor management

26. Contract Managers must manage all contractors in accordance with IAG's contractor and visitor management procedures.

27. Contractors on IAG premises must:

- a) Follow the security arrangements or directions at the site, including signing in at reception where applicable.
- b) Conduct themselves in a manner that does not adversely affect their own, 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.

28. 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.

29. Where requested, contractors must also complete the contractor pre-qualification process and 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

30. The Safety & Wellbeing Team will ensure:

- a) Employees are provided with appropriate injury management, rehabilitation, and return to work programs following a Workers' Compensation (AU), Accident Compensation (NZ) or rehabilitation accepted claim.
- b) Employees are provided with relevant information about Workers' Compensation (AU), Accident Compensation (NZ) or rehabilitation claims and injury management, including their rights and obligations with respect to rehabilitation and return to work.
- c) The confidentiality and privacy of employees' personal information relating to Workers' Compensation (AU), Accident Compensation (NZ) or rehabilitation claims is maintained in accordance with applicable legislation.

31. Where an employee has a work-related injury or illness, 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.
32. People Leaders must maintain regular contact (by agreement) with an injured or ill employee and make sure that return to work and rehabilitation plans remain safe and appropriate.
33. 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

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

Position	Responsibilities
<b>IAG Board</b>	Exercise due diligence in accordance with their statutory obligations under applicable WHS Laws and oversee safety and wellbeing at IAG. Ensure, so far as reasonably practicable, the health and safety of Workers in accordance with applicable WHS Laws.
<b>Employing Entity Boards (including Insurance Manufacturers of Australia Pty Ltd, Insurance Australia Group Services Pty Ltd and IAG New Zealand Limited)</b>	Exercise due diligence in accordance with their statutory obligations under applicable WHS Laws, including overseeing safety and wellbeing of Workers of the applicable entity. Ensure, so far as reasonably practicable, the health and safety of Workers in accordance with applicable WHS Laws. Review this Policy prior to the next review date. Consider reporting in relation to relevant WHS risks and incidents.
<b>Officers</b>	Exercise due diligence in accordance with their statutory obligations under the applicable WHS laws. Ensure, so far as reasonably practicable, the health and safety of Workers in accordance with applicable WHS Laws. Officers may also have other responsibilities outlined in this Policy.
<b>IAG Group Executive People, Performance and Reputation (Policy Owner)</b>	Make sure the Policy complies with the Group Policies and Procedures Policy. Review this Policy at least every three years unless a different time period is specified to meet regulatory or legislative requirements. Make sure all relevant stakeholders have reviewed this Policy or any changes to it prior to approval. Approve or reject any non-material out-of-cycle updates to this Policy. Make sure appropriate support, training, change plans, and communications are in place to implement this Policy or any changes to it. Approve exemptions from this Policy and report them to the Approver, as appropriate. Oversee compliance with this Policy and report any material adverse findings to the Approver.
<b>Group Leadership Team (Policy Approver)</b>	Approve or reject the Policy and any changes to it which are not non-material out-of-cycle updates. If appropriate, direct the Policy Owner to make any amendments that the Approver thinks are necessary. Receive reporting on exemptions from or material non-compliance with this Policy, as appropriate.
<b>People Leaders</b>	Maintain current awareness of the content of this Policy as updated from time to time and take active steps to ensure that they remain informed and understand their health and safety responsibilities and accountabilities.
<b>Workers, including employees and contractors</b>	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.
<b>Safety and Wellbeing Specialists</b>	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. Ensure reporting and insights is provided to the Employing Entity Boards (NZ, IMA, IAGS), Group Leadership team and NZ Leadership Team Risk Committee, in relation to IAG safety and wellbeing matters in compliance with this Policy. Suggest amendments to this Policy.

## Breaches

35. 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.
36. If you breach the WHS Law, you might face criminal or civil liability.
37. 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

38. In this Policy:

Term	Definition
<b>Contract Manager</b>	The contractor relationship manager or IAG staff member/s responsible for engaging and/or supervising a contractor to complete works on behalf of IAG.
<b>Hierarchy of Risk Control</b>	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.
<b>Notifiable Incident or Notifiable Event</b>	Incidents (AU) that are required to be notified to the Regulator under WHS Law, and includes without limitation: <ul style="list-style-type: none"> <li>• the death of a person,</li> <li>• a ‘serious injury or illness’, or</li> <li>• a ‘dangerous incident’.</li> </ul> Events (NZ) that are required to be notified to the Regulator under WHS Law, and includes without limitation: <ul style="list-style-type: none"> <li>• the death of a person,</li> <li>• a Notifiable ‘injury or illness’, or</li> <li>• a Notifiable incident’.</li> </ul>
<b>Officer</b>	A person 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 definition of officer under the applicable WHS legislation. If a person is responsible only for implementing decisions, they are not considered an officer.
<b>People Leader</b>	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.
<b>Regulator</b>	The relevant work health and safety authority in each jurisdiction in which this Policy is in force, under the relevant WHS Law.
<b>Remote or Isolated work</b>	Work that is isolated from the assistance of other persons because of location, time or the nature of the work.
<b>Structure</b>	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).
<b>Safety &amp; Wellbeing</b>	Means a Worker’s safety, health, and wellbeing relating to their work-activity, in the Workplace. Including their physical, psychological, social, and environmental health, safety and wellbeing.
<b>WHS Law</b>	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.
<b>Worker</b>	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.
<b>Workplace</b>	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.
<b>Work Health &amp; Safety Management System (WHSMS)</b>	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

39. 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, Group Business Partnering.

### Policy information

<b>Effective from</b>	16 June 2023
<b>Owner</b>	Group Executive, People, Performance and Reputation
<b>Approver</b>	Group Leadership Team – Risk Committee (GLT RC)
<b>Next review due</b>	16 June 2026
<b>Related documents</b>	Documents to be read in conjunction with this Policy are located here: <a href="#">Group Safety &amp; Wellbeing Policies, Procedures and Guidelines</a> .

### 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.
1.2	August 2022	Safety & Wellbeing Team	Update to related documents links.
1.3	20 October 2022	Group Legal	Update to section 30 – Roles & Responsibilities to include new position of Employing entity boards and responsibilities. Update to Safety and Wellbeing Specialists' responsibilities to include provision of reporting on compliance with the Policy.
		Safety & Wellbeing Team	Update to Related Documents section; removed list of procedural documents for AU and NZ in place of link to harmonised S&W procedures and guidelines.
2.0	April 2023	Group Legal	Updated sections 12, 18, 19, 24, 27 and 29 for clarity.
		Safety & Wellbeing Team	Updated Policy to reflect psychological safety in sections 9 and 14.
2.1	Jan 2024	Safety & Wellbeing Team	Updated Point 5 and 39 to reflect correct EGM title. Changed classification code to Public.

## 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, so far as reasonably practicable.
- 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 people to infectious diseases.
- f) Fostering a psychologically safe culture in which our purpose and values are lived each day and our people feel safe to perform at their best, ask questions and learn, give, and receive feedback, share diverse ideas and experiences, bring their whole selves to work, challenge the status quo, and speak up against unethical or inappropriate behaviour.
- g) Promoting wellbeing at work.
- h) Creating a mature and resilient culture of promoting safety and wellbeing.
- i) Developing, implementing, maintaining, and continually improving a comprehensive, integrated and prevention-of-harm focused health and safety management system.
- j) Complying with relevant work health and safety legislation and other regulatory requirements placed upon IAG, and its employees, contractors, directors, and agents.