

WHS undertaking

Undertaking to the Secretary, Department of Primary Industries and Regional Development,
given for the proposes of Part 11 of the *Work Health and Safety Act 2011 (the WHS Act)*

By

Groundwork Plus Pty Ltd

ACN: 609 422 791

ABN: 13 609 422 791

Section A – general information

1. Details of the company or individual proposing the undertaking			
Name of company	Groundwork Plus Pty Ltd (ACN 609 422 791)		
Registered address	120 High Street North Sydney NSW 2060		
Mailing address	As above		
Contact officer	[REDACTED]		
Position	Head of Legal, APAC – Risk, Contracts & Insurance		
Telephone	[REDACTED]	Mobile	[REDACTED]
Email address	[REDACTED]		
Legal structure	Australian Proprietary Company, limited by shares		
Type of business	Professional consultancy services		
Commencement date of the entity	20 November 2015		
Workers	Full time: [8]	Part time: [2]	Other: [0]
Products and services	- Laboratory providing materials testing services for the essential construction materials industry. - Software-as-a-service (SaaS) platform to clients to support site management across safety, environment, contractor management and plant and equipment maintenance.		
Comments	- On 31 January 2024 Groundwork Plus Pty Ltd (GWP) was acquired by SLR Consulting Australia Pty Ltd (SLR) and GWP has since been a wholly owned subsidiary of SLR. - Historically, GWP's services included the hiring out of its staff to contract as Mine/Quarry Managers to mine owners and operators (Mine/Quarry Manager Hire Service). The alleged contraventions pertaining to GWP arise in the context of its Mine/Quarry Manager Hire Service. - No new contracts post the incident have been entered into for quarry manager services.		

2. Details of the alleged contravention	
It is alleged that:	
A.	On 28 August 2023, GWP, being a person conducting a business or undertaking at Mt Magometon Quarry (Quarry), who had a health and safety duty under section 19(2) of the WHS Act to ensure so far as is reasonably practicable the health and safety of other persons, such persons not being workers engaged, or caused to be engaged by it and not being workers whose activities in carrying out work were influenced or directed by it while the workers were at work in the business or undertaking, was not put at risk from work in the business or undertaking, was not put at risk from work carried out as part of the conduct of the business of undertaking, did fail to comply with that duty and the failure to comply with that duty exposed other persons, in particular Mr K and Mr C, to a risk of death or serious injury contrary to section 32 of the WHS Act;
or, in the alternative,	
B.	On 28 August, GWP, being a person conducting a business or undertaking at the Quarry, who had a health and safety duty under section 19(1) of the WHS Act to ensure so far as is reasonably practicable the health and safety of workers engaged, or caused to be engaged by it and workers whose activities in carrying out work were influenced or directed by it, while the workers were at work in the business or undertaking, did fail to comply with

that duty and the failure to comply with that duty exposed workers, in particular Mr C and Mr K, to a risk of death or serious injury contrary to section 32 of the WHS Act.

3. Details of the events surrounding the alleged contravention

Parties

At the time of the alleged contravention:

- a) Mr C and Mr K were employees of [REDACTED], a company that provided contract crushing services to quarries including associated plant and equipment.
- b) Mr S, an employee of GWP, was certified to perform the statutory function of Quarry Manager.
- c) Coonamble Shire Council (Council) owned and operated the Quarry.
- d) [REDACTED] had supplied and operated a 2013 model Terex Finlay 694+ Supertrak tracked mobile screen (Mobile Screen) at the Quarry, pursuant to a contract with the Council.
- e) Pursuant to its Mine/Quarry Manager Hire Services, GWP had hired out its staff member, Mr S, to the Council as the Quarry Manager at the Quarry, pursuant to a contract with the Council.

Tracking the belt

At the time of the alleged contravention:

- a) The Mobile Screen comprised of a hopper. After material was deposited into the hopper, it was transported by the belt feeder to the main conveyor.
- b) The belt feeder was a rubber belt that rotated around idler drums at either end, and the rotation of the belt created an inward running nip point.
- c) For the belt to function correctly, from time to time, the alignment of the belt needed to be adjusted in a process known as 'tracking the belt'.

The Incident

On 28 August 2023, Mr C was undertaking the task of tracking the belt on the Mobile Screen with the assistance of Mr K. In the process of tracking the belt, the hinged rear door and hinged side doors had been opened and sections of fixed guarding at each side removed. The side access doors remained open. An inward running nip point was created on each side of the Mobile Screen where the belt turned around the idler drum at the rear of the machine. Whilst the belt was rotating, the idler drum and its bearing housing were exposed and readily accessible. Mr K then approached the area where the unguarded idler drum was rotating, and his arm became entangled in the inward running nip point on the right-hand side of the Mobile Screen and Mr K's arm was dragged around and entangled in the idler drum.

4. Acknowledgement that the Resources Regulator alleged a contravention has occurred

It is acknowledged that the Resources Regulator has alleged that GWP contravened the WHS Act in respect of the Incident.

5. Details of any injury that arose from the alleged contravention

Mr K's arm became entangled in the rotating tail drum of the Mobile Screen, pulling him into the drum up to his shoulder. Emergency Services were unable to remove Mr K's arm from its position wrapped around the idler drum. Mr K's arm was amputated to release him.

6. Details of any enforcement notices issued that relate to the alleged contravention

Notices received:

☐ Yes (provide details) ☒ No

7. Statement of assurance about future work, health and safety behaviour and compliance with the WHS Act

GWP is committed to complying with all its obligations under the WHS Act, the *Work Health and Safety (Mines and Petroleum Sites) Act 2013* (NSW) (WHS Mines Act) and all their associated Regulations.

8. When an alleged contravention is associated with an injury or illness

8.1. Details of the type of workers compensation provided (if the injured person(s) is a worker)

The injured person, Mr K, was engaged through [REDACTED], a party unrelated to GWP. Accordingly, Mr K is not an employee of GWP and the details of the type of workers compensation provided by Mr K's employer are not known to GWP.

8.2 Details of the support provided, and proposed to be provided, to the injured person(s) to overcome the injury/illness

The injured person is:

- ☐ an employee of the entity
☐ a self-employed person
☒ other (Mr K was engaged by [REDACTED], a party unrelated to GWP)
☐ not applicable

Support provided to the injured person(s) family

Date	Description of support	Comment
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Not Applicable

9. Details of any existing safety management systems at the workplace including the level of auditing currently undertaken

To provide context around the details of GWP's existing safety management systems at the workplace including the level of auditing currently undertaken, first GWP briefly outlines its integrated safety management system with SLR, and the nature of its workplace, as follows:

- GWP is fully consolidated with SLR, including from a safety management system perspective.
- All workers and representatives within GWP's workplace adopt and are bound by the health and safety systems implemented by SLR.
- Since the Incident:
 - o GWP has expanded its safety consulting capability in the quarry and mining sectors through additional resourcing and continued growth and utilisation of a proprietary SaaS platform called 'GPlus Live' which supports site management across safety, environment, contractor management and plant and equipment maintenance.
 - o A dedicated Construction Materials & Services technical discipline was established, with former GWP directors appointed into Technical Director roles and aligned leadership structure (including Regional Sector Leader, Practice Leader and Technical Director roles) reporting through SLR's APAC Managing Director and Chief Executive Officer. This was to ensure governance, accountability and integration within SLR's operational framework.
- GWP's leadership is involved in the consultation and implementation of these safety management systems.
- Given the nature of its business operations and services, GWP carries on business through it employed technical and digital experts operating within a laboratory and professional software environment. These workers accordingly tend to be engaged in non-physical administrative, technical and digital services in formal corporate offices. Though GWP no longer provides Manager/Quarry Hire Services to its clients, its workers do, at times, attend to provide low-risk and non-physical consultancy services at the workplaces of its clients which at times can include sites of mining or construction operations.

Safety Management System

GWP operates a comprehensive Health and Safety Management System (HSMS) aligned to the *WHS Act*, and consistent with ISO 45001:2018 (Occupational Health and Safety) and ISO 45003:2021 (Psychosocial Health and Safety). The HSMS applies across all operations within GWP's workplace and the workplaces of the broader SLR group, including office environments, field-based work (remote, urban and client sites), travel, and contractor activities.

The HSMS provides an integrated framework covering:

- Risk management: systematic identification, assessment and control of hazards using the hierarchy of controls, supported by a central risk register reviewed following incidents and at least annually.
- Documented safe systems of work: including Formal Risk Assessments, Safe Work Method Statements (SWMS) and task-level controls proportionate to risk.
- Consultation and communication: through inductions, training, safety meetings and formal reporting systems.
- Incident reporting and investigation: including notification of notifiable incidents and implementation of corrective and preventative actions.
- Competency and training management: governed by a Health & Safety Training Matrix and tracked through a learning management system. Training is an essential component supporting GWP's operations and the effective application of health and safety requirements. Online and external training is managed centrally, with GWP maintaining a single competency profile for each worker to demonstrate capability to perform work safely. All induction, training and competency records for GWP staff are maintained within GPlus Live, with reporting functionality enabling provision of auditable evidence of training completion to clients and stakeholders.
- Contractor and supplier management: incorporating prequalification, risk-based oversight, and verification of safe systems of work.
- Performance monitoring: monthly reporting of lead and lag indicators (e.g. hazards, near misses, injuries, incidents) to drive continuous improvement.

The system is supported by formal governance structures, defined accountabilities, and documented evidence requirements for all work activities, ensuring traceability of hazard identification, control implementation and review.

Auditing and Assurance

GWP maintains dedicated systems and a structured, risk-based auditing and assurance program, to verify HSMS effectiveness and compliance. Its integrated audit and assurance framework provides both periodic and real-time verification that the HSMS is implemented, effective, and aligned with legislative requirements across all GWP's operations. Key elements of the auditing and assurance system and programs (including level of auditing currently undertaken) include as follows.

- Full-scale formal internal audit project prescribed to occur at least annually.
 - This comprehensive audit of the risk management processes includes:
 - Review of incident data (IEX) and trend analysis.
 - Verification of risk register currency, including alignment with legislative and industry changes.
 - Confirmation that incident learnings and new hazards are incorporated.
 - Field verification through SWMS/site audits.
 - Assessment of worker competency and application of risk processes.
 - This project is undertaken by the Head of Health & Safety team.
- Ongoing compliance monitoring:
Continuous assurance activities embedded in operations, including review of:
 - Toolbox and safety meeting records
 - Plant/equipment inspections and maintenance records
 - Safe work observations
 - Incident reports and trend analyses
 - Health monitoring and driver safety data (IVMS)
 - Contractor prequalification and performance records

o Building inspections and workplace checks

- Performance review cadence:
Health and safety metrics are reviewed monthly at organisational level, with results communicated to workforce and leadership to monitor system performance and identify emerging risks.
- Corrective action management:
All audit findings, incidents and observations are recorded, tracked and closed out within defined timeframes. Actions include updates to the risk register, procedures, and controls, with accountability assigned to relevant management levels. Effectiveness is verified through subsequent monitoring and audit cycles.
- Continuous improvement:
The HSMS is a controlled, regularly reviewed system. Audit outcomes, incident learnings and performance data are systematically used to update policies, procedures and risk controls, ensuring ongoing compliance and effectiveness.
- The Head of Health & Safety team, during the internal audit project (referred to above) identifies and reports on any potential improvement actions and the Head of Health and Safety is then responsible for implementing those improvement actions.

10. Details of any consultation undertaken within the workplace regarding the proposal of a WHS undertaking (including workers and work health and safety representatives)

To provide context to GWP's response to this item, GWP first provides details of its relevant workplace, workers, relevant leadership and work health and safety representatives.

GWP's workers and workplace

Given the nature of its business operations and services, GWP carries on business through employed technical and digital experts operating within a laboratory and professional software environment. These workers accordingly tend to be engaged in non-physical administrative, technical and digital services in formal corporate offices. Though GWP no longer provides Manager/Quarry Hire Services to its clients, its workers do, at times, attend to provide low-risk and non-physical consultancy services at the workplaces of its clients. These workplaces include external office environments and can include in the vicinity of mining operations or construction sites.

GWP's leadership and safety representatives

GWP is fully consolidated with SLR, including from a leadership and health and safety representative perspective. All workers and representatives within GWP's workplace adopt and are bound by the health and safety systems implemented by SLR. Equally, all leadership and health and safety representatives with SLR are accountable to ensure GWP can and does meet its work health and safety obligations and undertakings, including in relation to this enforceable undertaking.

Consultation undertaken within the workplace regarding the proposal of a WHS undertaking

The following workers and/or representatives within GWP's workplace have been consulted regarding the proposal of a WHS undertaking.

Persons consulted	Details of consultation
Chief Executive Officer	Relevant roles and responsibilities of these people These senior executives all have obligations to develop and promote health, safety and wellbeing leadership and to ensure that significant health, safety and associated legislative issues and initiatives are supported and appropriately prioritised and resourced within the business. The APAC Executive Director and the Head of Health and Safety are required to ensure:
Global Health & Safety Director	
APAC Executive Director and the Board of Directors of GWP	

Head of Health and Safety – APAC	a) Learnings from significant incidents are shared throughout the region as part of GWP's system of continuous improvement in work health and safety performance; b) Implementation of work health and safety projects obligations; and c) Review the effectiveness of work health and safety initiatives. Additionally, the Head of Health and Safety is also responsible for: a) Ensuring that all health and safety initiatives and obligations are effectively communicated and embedded across GWP's workforce; and b) Championing and overseeing meaningful consultation with staff and leaders on health, safety and wellbeing matters. Consultation with these persons Consultation has occurred through: a) Numerous meetings, including board meetings and scheduled formal meetings between the internal stakeholders; b) Emails outlining the proposed enforceable undertaking and inviting feedback and discussion; c) Discussions at leadership meetings convened between relevant named people. Reason for consultation Consultation with these senior executives and health and safety leaders within GWP was undertaken regarding the proposal of an enforceable undertaking because an enforceable undertaking is a significant health and safety obligation of serious concern to the business which demands due resourcing, prioritisation and accordingly business-wide support, engagement and approval.
██████████	Relevant roles and responsibilities of ██████████ ██████████ is the Construction Material & Services Practice leader within GWP. As a business unit leader, he has the day-to-day responsibility (as do all other business unit leaders) to: a) Support the provision of appropriate health and safety resources and ensure achievement of staff training and competency requirements within his business unit; b) Provide strategic input into the development, achievement and monitoring of GWP's health and safety objectives and performance targets; c) Promote and share key safety principles through regular and effective communication with staff; d) Enable meaningful consultation and participation for staff on health, safety and wellbeing matters. ██████████ possesses decades of experience in the development and delivery of health and safety and compliance training to mine owners, operators and managers. ██████████ was a director of GWP at the time of the Incident. ██████████ was directly involved in overseeing GWP's provision of its Mine/Quarry Manager Hire Services generally and particularly GWP's contract with the Council to hire out Mr S as a Quarry Manager for the Council at the Quarry. Consultation with ██████████ ██████████ was consulted regularly in relation to this proposed enforceable undertaking. Reason for consultation

	█████'s close consultation and input into the enforceable undertaking application was essential to ensure that: a) The enforceable undertaking closely reflected and represented (now and at the time of the incident and the time of the events surrounding the incident) GWP's acknowledgement of the seriousness of, and regret about, the incident and the events surrounding the incident; b) The enforceable undertaking proposed would be most effectively planned and executed and the most desirable intended outcomes be achieved. Among other things, this is due to: i. █████ relevant professional and industry expertise in the implementation and execution of health and safety training and compliance programs; ii. The expectation and understanding within GWP and the broader SLR business (through consultation with the leadership referred to above) that █████ and his business unit's time and resources will be diverted from revenue-generating work over the next 2 years to prioritise, implement and execute the projects anticipated in this enforceable undertaking. █████ will also be involved, if required, in the hiring process of any further resources to be dedicated to the implementation and execution of these projects.
Each of GWP's other directors at the time of the Incident	Those persons who were directors of GWP at the time of the Incident have been consulted throughout the process on the proposed enforceable undertaking. This was necessary to ensure that: a) Remain vested in, and committed to, the process and outcomes anticipated by the enforceable undertaking and its projects; and b) The enforceable undertaking closely reflected and represented (now and at the time of the incident and the time of the events surrounding the incident) GWP's acknowledgement of the seriousness of, and regret about, the incident and the events surrounding the incident.

11. Statement of regret that the incident occurred (ie not an admission of guilt)

GWP regrets that the incident occurred and it is ashamed by its association with the incident. GWP is saddened by the pain experienced by Mr K, his family and those other workers (including Mr C) and any support persons who witnessed the incident and Mr K's injury.

Health and safety are cornerstones of GWP's operations. GWP believes that incidents and injuries are preventable, and that no one should be harmed while conducting work. GWP believes that we are all leaders of health and safety.

12. Any rectifications made as a result of the alleged contravention

Systemic and long-term rectifications

As a result of the incident and prior to there being any allegations of a contravention, GWP was concerned, as a contract supplier of key safety personnel to client's mines, that without GWP having direct control of its client's workplace:

- a) GWP may be limited in its ability to ensure the contracted-out Mine/Quarry Manager fully complied with its significant personal responsibilities in relation to ensuring the safety of workers and other people at the workplace;
- b) GWP could not assure itself that the best health and safety outcomes (in accordance with its further developed policies and procedures) could be achieved.

To rectify this concern, following the incident and prior to these allegations being made, GWP formally resolved to cease its offering of provision of any Mine/Quarry Manager Hire Services to any clients. Other Quarry Manager Services being undertaken at the time under existing contracts were allowed to run to the earlier of contract term completion or end June 2024. It is difficult to accurately estimate the cost (including lost future revenue) to GWP for having withdrawn this service offering. However, the financial cost of this measure was not insignificant.

Immediate rectifications

In the immediate term, whilst GWP was formalising its decision to withdraw its Mine/Quarry Manager Hire Services offering, and whilst Mr S was still engaged by the Council at the Quarry:

- a) GWP required and ensured that Mr S conducted an audit of the emergency stop systems of various items of plant at the Quarry. That audit included testing of the emergency stops;
- b) GWP developed for the Council a new *Mine Safety Management Plan* that included the following:
 - iii. A document entitled *Plant Site Arrival Checklist* that specified, among the various checks to be performed, 'Safety guards fitted over moving or hot parts'
 - iv. A Mechanical engineering control plan which, in turn, included:
 - A. A document entitled *Form 10G – Plant and vehicle introduction to site* that specified the checking of various items including guards on all moving and hot parts, and emergency stops;
 - B. A document entitled *Form 10D – Crushing and screening plant pre-start check sheet* that identifies daily inspections are required of various items described as being 'Priority "HIGH" faults'. These items included the following:
 - Guards;
 - Tail drums;
 - Idler rollers;
 - Other nip points;
 - Lanyards; and
 - Emergency stops.

The document states further that in the event of such faults 'The machine must be tagged OUT OF SERVICE and NOT operated until repaired'.

13. Acknowledgement that the WHS undertaking may be published and publicised

GWP acknowledges that the undertaking will be published on the Regulator's website and may be referenced in Resources Regulator material. GWP acknowledges that the undertaking may be publicised in newspapers or other publications. (where applicable, as specified in Section B – enforceable terms).

14. Statement of ability to comply with the terms of the undertaking

GWP is able to comply with the terms of the undertaking. In this regard, GWP outlines the following matters.

SLR Financial Statements

From a financial reporting and operational perspective, GWP is fully consolidated within the SLR Group. As such, GWP:

- a) Does not prepare separate financial statements. Its financial position and performance are reflected within the consolidated accounts of SLR;
- b) GWP's cash flow, funding, and financial obligations (including any Enforceable Undertaking commitments) are managed at a group level.

Appearing at Attachment A are the following documents:

- a) SLR's latest draft unaudited financial statements for FY2025;

- b) SLR's latest Management account Balance sheet FY2026 P4 (April 2026);
- c) SLR's audited financial Statements FY2024;
- d) SLR's audited financial Statements FY2023.

Group prioritisation and leadership support

Through relevant business head and leadership consultation, referred to in item 10 above, GWP has received assurance that all terms of the Enforceable Undertaking will be given strict operational and resourcing attention and priority for the entire anticipated duration of the undertaking and throughout.

GWP's business

As its own legal entity, GWP remains and anticipates it will remain (well beyond the anticipated duration of the undertaking) a key operational business unit and going concern. GWP does and will continue to, in its own name and own legal capacity, employ people, hold and enter into long-term contracts with clients and suppliers, operate laboratories and hold its own valuable IP in software products which it sells from that entity.

15. Statement regarding relationships with beneficiaries

GWP acknowledges that there are no known current relationships with any of the beneficiaries outlined in this enforceable undertaking, other than the current employees of GWP and the broader mining industry, many of whom are current GWP clients.

16. Intellectual property licence

GWP grants the Regulator a permanent, irrevocable, royalty-free, world-wide, non-exclusive licence to use, reproduce, publish, distribute, electronically transmit, electronically distribute, adapt and modify any materials developed as a result of this WHS undertaking.

17. Acknowledgement that materials, information or deliverables under WHS undertaking accurate

GWP acknowledges that any material, information or deliverable developed as a result of, or representations otherwise related to, this WHS undertaking are accurate, true, correct, complete, balanced, objective and not misleading.

18. The company or individual may be required to provide information of any prior work health and safety convictions

The Regulator requests a list outlining details of any prior work health and safety convictions or findings of guilt under work health and safety legislation¹ or work health and safety related legislation.

Does GWP have any such prior convictions or finding?

☐ Yes ☒ No

19. Commitment to participate constructively in all compliance monitoring activities of the undertaking

GWP acknowledges that responsibility for demonstrating compliance with this enforceable undertaking rests with the organisations who have given this enforceable undertaking. Evidence to demonstrate compliance with the terms will be provided to the Regulator by the due date for the term.

GWP acknowledges that co-operation will be provided to the Regulator in the event that the Regulator chooses to undertake other compliance monitoring activities (such as a site visit) to verify the evidence provided.

GWP acknowledges that material offered as evidence of compliance will be retained by the person throughout the period of the undertaking.

¹ Subject to any local legal constraints such as spent conviction legislation

20. Commitment that the behaviour that led to the alleged contravention has ceased and will not reoccur

GWP commits that the behaviour that led to the alleged contravention has ceased and that GWP will take all reasonably practicable steps to prevent the reoccurrence of such behaviour. As above, GWP subsequently withdrew its provision of Mine/Quarry Manager Hire-out Services to clients.

21. Commitment to the ongoing effective management of work health and safety risks

GWP is committed to the ongoing effective management of work health and safety risks in accordance with the WHS Act, WHS (Mines and Petroleum Sites) Act and all relevant regulations. GWP believes that incidents and injuries are preventable and no one should be harmed while conducting work. GWP fosters a culture in which all employees and contractors share a commitment to the health and wellbeing of staff.

GWP is committed to:

- a) Communicating the Global Health & Safety Policy to its staff
- b) Eliminating all injuries
- c) Proactively managing critical safety and health risks for GWP employees, clients and the communities it serves
- d) Meeting or exceeding client and applicable regulatory safety & health requirements
- e) Providing employees with the training and support essential for completing work safely and meeting client and regulatory requirements
- f) Tracking specific leading and lagging metrics to monitor performance and determine progress toward safety objectives
- g) Continually evaluating and refining its systems to ensure they provide maximum effectiveness and its practices remain properly protective

22. Acknowledgment of WHS undertaking guidelines

I have read and understood:

Enforceable undertakings guidelines version 9.1 dated May 2025 published by the Department of Primary Industries and Regional Development.

Section B – enforceable terms

1. Publication of information about the undertaking

GWP must, within 30 days of receiving notification from the Regulator of the acceptance of the WHS undertaking, cause a public notice to be published in The Daily Telegraph, Sydney Morning Herald and one edition of the IQA's Quarry Magazine's e-Newsletter which will be drafted using the script provided in Attachment B.

2. Commitment to disseminate information about the undertaking to workers, and other relevant parties (which may include work health and safety representatives), and in the annual report (if applicable)

GWP must disseminate information by implementing the following:

- Display a summary of the WHS undertaking at the GWP main office noticeboard for a period of at least 30 days commencing within 30 days of receiving notification from the regulator of the acceptance of the WHS undertaking;
- Communicate, as far as reasonably practicable, the WHS undertaking to workers, including staff and contractors, following acceptance;
- Issue a written communication to all GWP workers in relation to the WHS undertaking. The written communication will provide information about the WHS undertaking and the initiatives;
- Review the implementation and progress of the WHS undertaking per month at Work Health and Safety Committee Meetings;
- Provide an update on the progress of the WHS undertaking each quarter at the Executive Leadership Team Meeting.

Dissemination by each of the above methods must occur within 30 days of receiving notification from the regulator of the acceptance of the WHS undertaking and unless otherwise specified above, continue at regular intervals of no more than three months throughout the life of the undertaking.

3. Strategies that will deliver worker benefits

It has been agreed between GWP and the Resources Regulator that, having regard to the risks to health and safety which its laboratory and software related workers are exposed relative to that to which workers at quarries are exposed coupled with the fact that the incident to which this WHS undertaking relates occurred at a quarry, GWP will direct its attention to strategies that will deliver benefits to the quarrying industry set out at section 4 instead of its workers.

4. Strategies that will deliver industry benefits

Project 1: Training Programs

GWP will develop and deliver training programs relating to discharging of obligations of supervisors and managers at mines and quarries. Detailed in Attachment C.

Project 2: Scholarship Awards

GWP will fund an award through the Institute of Quarrying Australia (IQA). Specifically, GWP will provide funding to the IQA to be awarded to a person currently working in the quarry or related industries.

The IQA will be engaged to promote the scholarship to members and non-members within the quarrying industry.

The award winner will receive:

- a) A grant of \$5,000; and

- b) \$5,000 for attending the IQA's bi-annual conference, covering registration, accommodation, and travel expenses.

There will be 2 award winners over a two-year period (with each award being valued at \$10,000 per recipient) – the first within the 12 months following acceptance of this enforceable undertaking by the Regulator and the second within 24 months following acceptance of this enforceable undertaking by the Regulator if not before.

Selection Process and Criteria For Application

The selection criteria for potential recipients of this award are as follows:

1. The person must be working in the quarry industry or a related adjacent industry in NSW; and
2. The person must have undertaken a project or initiative relating to supervision concerning one or more of the following areas:
 - a. Prestart/Toolbox talks;
 - b. Emergency response;
 - c. Verification of Competency (VoC);
 - d. Hazard identification and risk assessment processes;
 - e. High risk work and permit to work systems;
 - f. Equipment guarding and safety devices;
 - g. Encouraging feedback and raising of concerns/hazards/risks;
 - h. Site inspections and check of the work environment;
 - i. Prestart checks of plant prior to use;
 - j. Fitness for work assessments of workers;
 - k. Safety Management System requirements and ensuring compliance with actions and commitments; and
3. Make an application to the IQA addressing nominated selection criteria focused on supervision.

To apply for the award, the person can self-nominate or be nominated by others to be considered for the prize. The IQA will be engaged to facilitate a judging process and panel made up of industry subject matter experts to select the best application/submission and select the award winner. The selection criteria for the award will be consistent with but not limited to the elements identified above and in the Supervisor Training Program. The award winner will be required to prepare and present a paper on the supervision project or initiative at one of the NSW Resources Regulator Roadshow events.

5. Strategies that will deliver community benefits

Project 3: Donation to Regional air rescue provider

GWP will make a one-off donation of \$30,000 to Careflight conditional upon it being used for rescue services in regional areas of NSW.

The donation will be made within 12 months following acceptance of this enforceable undertaking by the Regulator.

6. Commitment regarding the strategy and promotion of benefits to the WHS undertaking

GWP commits that it will link the promotion of any benefits arising from the enforceable undertaking and associated initiatives to the enforceable undertaking.

7. Reimbursement of the Regulator's agreed costs associated with, and any monitoring of, the enforceable undertaking

GWP agrees to pay the Regulator's recoverable costs associated with the undertaking, as itemised below, and acknowledges that payment is due 30 days after receipt of the Regulator's invoice:

☐ investigative, legal and administrative costs	\$ 101,400
☐ compliance monitoring costs	\$ 12,500
Total amount	\$ 113,900

8. Minimum spend

GWP must spend a minimum of \$463,900, excluding GST, in carrying out its obligations as set out in this WHS undertaking, inclusive of the Regulator's recoverable costs.

GWP acknowledges the minimum spend comprises of:

Activities to deliver	Total estimated cost
Benefits to workers	N/A – See below
Benefits to industry	\$ 320,000
Benefits to community	\$ 30,000
Regulator recoverable costs	\$ 113,900
Estimated total value of the undertaking	\$ 463,900

9. Project of undertaking

Where a project or projects are proposed to deliver benefits to the industry and community, GWP offers and will carry out the projects set out in Attachment C to this WHS undertaking.

10. Timeframe for delivery

Unless otherwise stated, the strategies set out in this WHS undertaking must be completed by GWP on or before 24 months following acceptance of this enforceable undertaking by the Regulator.

23. Section C – Offer of undertaking

	By a corporation As a duly appointed and authorised officer or agent of Groundwork Plus Pty Ltd I offer this undertaking and commit Groundwork Plus Pty Ltd to the terms herein. Signed: Director Name: Position: Director Dated: 3 August 2026 Signed: Company Secretary Name: Position: Company Secretary Dated: 3 August 2026
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Section D – Regulator’s acceptance of undertaking

I accept this undertaking as an enforceable undertaking under section 216 of the *Work Health and Safety Act 2011*.

Signed: [REDACTED]

[REDACTED]

Position: **Executive Director Resources Regulator**

delegate of the Secretary, Department of Primary Industries and Regional Development

Dated: **07/08/2026**

Attachment A

The following documents have been provided to the Regulator by way of attachment to the covering email (on a non-publication basis) containing this application:

- SLR's latest draft unaudited financial statements for FY2025;
- SLR's latest Management account Balance sheet FY2026 P4 (April 2026);
- SLR's audited financial Statements FY2024; and
- SLR's audited financial Statements FY2023.

Attachment B

Notice of Regulator's acceptance of a WHS undertaking under Part 11 of the *Work Health and Safety Act 2011*

On 23 August 2023, a worker employed by [REDACTED] was injured while undertaking a cleaning and maintenance task at Mt Magometon Quarry (Quarry). The worker's arm became entangled in the rotating tail drum of a tracked mobile screen (Incident). At the time of the Incident, the statutory Quarry Manager at the Quarry was an employee of Groundwork Plus Pty Ltd (GWP) who was contracted (hired out) to the Quarry's owner.

The Department of Primary Industries and Regional Development investigated the incident and subsequently alleged that GWP failed to comply with health and safety duties under sections 19(1) or, in the alternative, 19(2) of the *Work Health and Safety Act 2011* (NSW).

GWP entered into an enforceable work health and safety undertaking with the Secretary of the Department of Primary Industries and Regional Development in relation to the Incident (WHS Undertaking).

This notice has been published under the terms of the WHS Undertaking and acknowledges acceptance of an undertaking, that is enforceable under the WHS Act, from GWP.

The WHS Undertaking requires the following actions – GWP will:

1. Develop training programs to be delivered to quarry workers, managers and supervisors across six regional NSW locations aligned with the Institute of Quarrying Australia's (IQA) NSW sub-branches (Central West, Hunter, Southern and Northern).
2. Fund two annual supervision prizes through the IQA to the value of \$10,000 each which will be awarded to a person engaged in the quarry or related industries.
3. Make a \$30,000 donation to Careflight.

The total value of the WHS undertaking is approximately \$463,900.

The full undertaking and general information about enforceable undertakings is available at resources.nsw.gov.au

Attachment C

This attachment is incorporated in, and considered part of, the WHS undertaking given by GWP for the purposes stated herein, and are enforceable terms given under section B of the undertaking by GWP.

GWP will undertake the following.

TRAINING PROGRAMS AND HANDBOOKS FOR QUARRY WORKERS AND QUARRY MANAGERS AND SUPERVISORS

GWP will develop two training programs with particular focus on local government operations for:

1. Quarry worker roles (Worker Training Program); and
2. Quarry managers and supervisor roles (Supervisor Training Program).

Details of each of the Worker Training Program and Supervisor Training Program are discussed in further detail below. Both Programs will be implemented across six (6) locations in regional NSW in part aligned with the Institute of Quarrying Australia's (IQA) subbranches (the Central West (two locations), Northern, Hunter & Central Coast, Murray Riverina and Southern Regions) (six (6) locations). The programs will be delivered with the support of the IQA and internal WHS subject matter experts within SLR who will work with the IQA to develop content and learning objectives.

Across a two (2) year period, the programs will provide instruction and training on identifying and controlling health and safety risks associated with NSW Local Government Quarry operations. The programs will include both key learnings and practical tools for use by the participants to implement at their operations, contributing to an improvement in safety culture.

Hand books will be developed for each Program to provide an ongoing source of reference along with templated checklists, risk assessments and work instructions to support smaller quarries with limited resources. These will be built in consultation with Original Equipment Manufacturers (OEM) and industry stakeholders.

DESIGN

Objective and Outcomes of the Worker Training Program

This Program will equip workers with knowledge and practical skills to identify critical safety devices, verify correct installation and test and confirm operational effectiveness. A key component of the training design is its promotion of behavioural change onsite in relation to safety devices associated with mobile crushing and screening plant including how workers can identify their correct installation and verify they operate as intended.

It is expected that the following outcomes from the Worker Training Program will be achieved:

- Improved hazard awareness;
- Improved control selection and verification;
- Improved communication/consultation skills;
- Reduced incidents.

Objective and Outcomes of the Supervisor Training Program

This training program will be designed to provide Supervisors with training in managing risk onsite and drive behavioural change from one of mere compliance to effectiveness of systems and processes onsite.

The same outcomes as addressed in the Worker Training Program are expected to be achieved in the Supervisor Training Program, ensuring that essential training and knowledge are embedded across all levels of the workforce - from supervisors to frontline workers. This alignment enhances capability across the organisations and increases the likelihood of improved safety outcomes.

Topics Addressed – Worker Training Program

Training would include the following elements:

- Types of safety devices use on mobile crushing and screening plant including:
 - o E-Stops
 - o Lanyards (pull wires)
 - o Guards
 - o Belt protection devices
 - o Interlock systems
 - o Warning systems
 - o Travel plugs
 - o Lock Out Tag Out
 - o Overload and detection systems
 - o Fire suppression systems
- Hazard identification and risk assessment processes
 - o Prestart checks
 - o Risk assessments
 - o Safe Work Method Statements
 - o Identification of critical safety devices
 - o Verification of implementation
 - o Confirmation of effectiveness
- Common unsafe behavioural practices
- Speak up and Reporting of Hazards, unsafe conditions
- Documentation and checklists

Topics Addressed – Supervisor Training Program

Training would include the following elements:

1. Prestart/Toolbox talk preparation for the start of shift or change of shift, outlining priorities for the day, risks and hazards, operational changes, tasks and responsibilities
2. Emergency response personnel and emergency drill exercises
3. Verification of Competency (VoC)
4. Hazard identification and risk assessment processes
 - v. Risk assessments
 - vi. Safe Work Method Statements
 - vii. Identification of controls
 - viii. Verification of control implementation
 - ix. Monitoring of control effectiveness
5. High risk work and permit to work systems
6. Equipment guarding and safety devices
7. Encouraging feedback and raising of concerns/hazards/risks
8. Site inspections and check of the work environment
9. Prestart checks of plant prior to use and in accordance with OEM requirements to ensure fit for use
10. Fitness for work assessments of workers
11. Safety Management System requirements and ensuring compliance with actions and commitments

Delivery Method and Frequency – Worker Training Program

The program will allow for attendance both in person at a workshop and by way of online webinar across one full day. Training will be delivered in the six (6) locations with a focus on areas which have local governments with quarry operations. Facilitation of the program is designed to be provided at these six (6) locations which are within a two (2) hour drive from quarry locations so as to enable participants to attend in person where possible.

Delivery Method and Frequency – Supervisor Training Program

The program will allow for attendance both in person at a workshop and by way of online webinar across two non-consecutive days. Again, the training will be delivered in six (6) locations with a focus on areas which have local governments with quarry operations. Facilitation of the program is designed to be provided at these six (6) locations which are within a two (2) hour drive from quarry locations so as to enable participants to attend in person where possible. GWP acknowledges the potential resourcing difficulties faced by some quarry supervisors and will allow for at least one day of the training program to be undertaken online.

Delivery Locations - Worker and Supervisor Training Program

GWP proposes that the training is delivered in six (6) local government quarries cross regional NSW, with a focus on the areas which have local governments with quarry operations. As identified above, the six (6) locations are as follows:

- i. Northern
- ii. Hunter & Central Coast
- iii. Central West (two locations)
- iv. Murray Riverina
- v. Southern

SLR would appreciate the input of the Resources Regulator with respect to those local government quarries that may benefit from the proposed training. It is proposed to host the training in the above regional areas of NSW to enable travel to the venue two (2) hours from the quarry locations.

Audience - Worker and Supervisor Training Program

The training programs will be tailored to quarry workers, manager and supervisor roles with particular focus on local government operations. Whilst SLR cannot enforce the mandatory attendance of local government workers, quarry managers and supervisors will be strongly encouraged to attend the sessions in their entirety.

GWP would be pleased to propose specific local government owned quarries, or work collaboratively with the Regulator to determine these, particularly if the regulator has already identified specific quarries that may benefit from such education/material.

IMPLEMENTATION – WORKER AND SUPERVISOR TRAINING PROGRAMS

Personnel

SLR has a number of subject matter experts (SME) who will be involved in developing the training content for both programs. The IQA will also be engaged to review the developed content and provide input to ensure the learning objectives are met and that the programs are developed in line with appropriate learning frameworks.

Timeline for Implementation

The anticipated implementation timeline for each of the programs is as follows:

1. Development and design phase: 6 months;
2. Pilot/testing phase: 3 months;
3. Initial roll out phase: 3 months;
4. Full implementation phase: 12 months;
5. Ongoing maintenance and review cycle: programs will be reviewed following each delivery.

Mitigation of Risks Delaying Implementation

SLR has a number of SME's that are experienced in this area who could assist if the nominated personnel are unable to continue with implementation. SLR could also outsource this work if required through the IQA should no internal resource be able to complete the project. The IQA will be engaged to also assist in co-ordinating the training programs and to encourage local government attendance.

EXECUTION AND DELIVERY OF THE PROGRAMS

Personnel – Worker and Supervisor Training Program

The programs will be delivered with the support of the IQA and internal WHS subject matter experts within SLR who will work with the IQA to develop content and learning objectives.

It is proposed that the IQA are appointed to oversee the training programs and project manage the training events. SLR will directly facilitate the training with subject matter experts within the business with experience in the industry and supervision delivering the training. The responsibilities of the project manager will be to organise venues, catering, register and record participant details, reporting to GWP/SLR, obtain participant feedback and review training material prior to delivery.

The SLR facilitators will be responsible for delivery of the training material, engagement with participants and assessing competency of attendees.

Risks to Execution of the Training – Worker Training Program

Some of the sites may be geographically restricted, limited in resources and not be able to release their workers for the time required to complete the training. The IQA will be provided with the training material to allow for future training events to be organised and delivered by the IQA. One online session will also be undertaken to allow for those workers who may not be able to travel to participate.

Risks to Execution of the Training – Supervisor Training Program

Some of the sites may be geographically restricted and limited in resources and not be able to release their workers for the time required to complete the training. This obstacle will be overcome by undertaking one online training event at the end of the face to face delivery period of the project to allow for those who have been unable to attend to participate. Further, the IQA will be provided with the training material to allow for future training events to be organised and delivered by the IQA.

Systems For Training Delivery - Worker and Supervisor Training Program

The IQA will be engaged to assist with this component, who have an established learning management system to enrol, remind and track compliance. Quarterly reports will be provided in relation to the project and progress.

Attendance Requirements - Worker and Supervisor Training Program

Engagement with the local governments will occur prior to request that attendance be compulsory for relevant Workers and Supervisors. Attendance will be tracked with information collected and provided to the Resources Regulator on the attendees following each event.

Performance & Compliance Measures - Worker and Supervisor Training Program

The IQA will be engaged to manage this component of the project using their established learning management system to track participation and report to GWP/SLR.

Training outcomes and effectiveness will be measured by:

- Training attendance and completion rates
- Pre- and post-training knowledge assessments
- Participant confidence/self-assessment improvements
- Reduction in reported incidents or near misses (where data available)
- Increased hazard reporting rates
- Audit findings and close-out rates

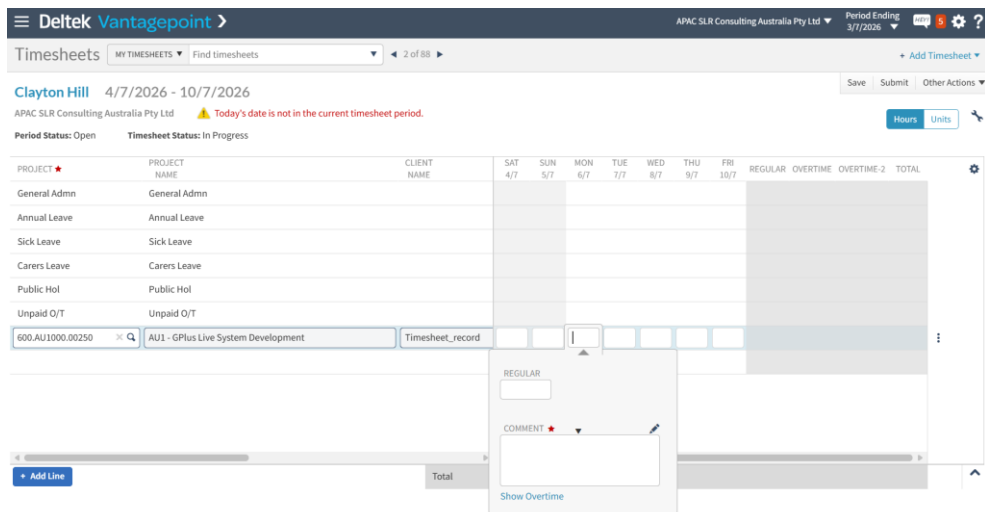
To assess the utility/benefit/usefulness of the safety training be measured, GWP/SLR will take feedback from the participants and follow up with a selection of attendees to confirm learnings and site implementation.

For the Supervisor Training Program specifically, it is proposed that this course is delivered across two (2) non-consecutive days to allow for participants to return to their workplace and bring evidence of implementation to the second day of the course.

GWP/SLR will be in regular contact with the IQA who will be responsible for enrolments, recording participant details, gathering feedback and ensuring compliance with the programs. It is intended that the IQA’s learning management system will be used to track these details, and GWP will review these reports and discuss internally at least on a quarterly basis at WHS Committee meetings. Training effectiveness is expected to be measured from training attendance and completion rates, pre and post training knowledge assessments, reduction in reported incidents or near misses, and increased hazard reporting rates. The relevant training records will be sent to GWP/SLR to review, following which, a summary report can be provided to the Resources Regulator for progression purposes.

Training records will be stored, retained, and audited with the assistance of the IQA and their learning management system. The IQA will provide a quarterly report to GWP/SLR which will in turn be provided to the Resources Regulator.

The IQA, who have also been involved in other similar Enforceable Undertaking project deliveries, will be engaged to manage the programs. SLR uses Deltek Vantagepoint to record timesheets for staff engaged in the project. A job number will be set up for the project to enable staff to record time and cost to the project. An example screenshot of this is below:



POST-PROGRAM ACTIVITIES AND HANDBOOKS - WORKER AND SUPERVISOR TRAINING PROGRAMS

Handbook

It is anticipated that in tandem with the development of the training programs, there will be development of handbooks for ongoing reference along with templated checklists, risk assessments and work instructions to support smaller quarries with limited resources. This will be built in engagement with OEMs and industry stakeholders.

The handbooks will be supplied to Workers and Supervisors following completion of their course rather than during, to encourage more active engagement during the course and to provide reinforcement of learning afterwards.

Training content

The training content following completion will be handed over to the IQA to allow for facilitation post project to other areas of the industry. It will be made available for the IQA to continue delivery to the industry post project.

COSTS

Costs have been developed based on SLR's internal rates, benchmarked against comparable industry training programs, and include allowances for regional delivery logistics. All project expenditure will be tracked against a dedicated cost code within SLR's financial system to ensure transparency and auditability.

Worker Training Program

A breakdown of these anticipated costs associated with development, delivery and management of the Worker Training Program is as follows:

- Development and Peer Review \$45,000
 - o Content development \$30,000
 - o Peer Review \$5,000
 - o Finalisation of training package \$10,000
 - Delivery \$45,000
 - o 6 locations @ \$7,500 per location (incl travel costs)
 - Project Management \$10,000
 - o SLR \$5,000
 - o IQA \$5,000
- Total \$100,000

Supervisor Training Program

A breakdown of these anticipated costs associated with development, delivery and management of the Supervisor Training Program is as follows:

- Development and Peer Review \$80,000
 - o Content development \$60,000
 - o Peer Review \$10,000
 - o Finalisation of training package \$10,000
 - Delivery \$100,000
 - o 6 locations @ \$15,000 per location (per 2 day event incl travel costs)
 - o 1 x online delivery \$10,000
 - Project Management \$20,000
 - o Facilitator \$5,000
 - o IQA \$15,000
- Total \$200,000