

CLARK Property Partners Pty Ltd

ABN 68 641 858 737

t/as CLARK Commercial | CLARK Prestige | and associated divisions

CPP-POL-09

Workplace Health & Safety Policy

Version 1.2 | June 2026 | Approved: Stephen Clark, Managing Director

Defined Term

CLARK Property Partners Pty Ltd (ABN 68 641 858 737) trading as CLARK Commercial, CLARK Prestige, and associated divisions and business names is referred to throughout this Policy as "**CPP**". All references to CPP in this document apply to the entire organisation including all trading divisions, business names, personnel, directors, contractors and agents acting on behalf of CPP.

Legislative Context

This Policy reflects CPP's obligations under the Work Health and Safety Act 2011 (Qld), Work Health and Safety Regulation 2011 (Qld), and all applicable WHS codes of practice, Australian Standards and guidance materials issued under WHS legislation.

01 Policy Statement

1. Policy Statement

CLARK Property Partners Pty Ltd (ABN 68 641 858 737) trading as CLARK Commercial, CLARK Prestige, and associated divisions and business names ("CPP") is committed to providing and maintaining a safe and healthy working environment for all personnel, clients, tenants, contractors, customers and visitors at every workplace and asset under CPP's management or occupation. Health and safety is a non-negotiable standard — not a variable based on cost or convenience.

02 CPP's WHS Commitments

2. CPP's WHS Commitments

CPP will:

- Comply with all applicable WHS legislation, regulations and codes of practice at all times
- Provide a physically and psychologically safe workplace for all CPP personnel across all divisions
- Identify, assess and control workplace hazards and risks across CPP's own operations and the assets it manages
- Consult with workers on WHS matters that affect them
- Ensure all CPP personnel are appropriately trained, inducted and equipped to work safely
- Maintain all workplaces and managed assets in a safe and well-maintained condition
- Respond immediately to any incident, near miss or safety concern — with no retaliation against any person who raises a safety concern in good faith

03 WHS at Managed Assets

3. WHS at Managed Assets

At all retail, commercial and hospitality assets managed by CPP on behalf of clients, CPP will:

- Conduct a WHS site induction for all CPP personnel prior to commencing work at any new managed asset
- Perform hazard identification and risk assessment as part of the initial management transition for each new asset
- Maintain a site-specific WHS register including identified hazards, risk ratings, control measures and review dates
- Ensure all contractors engaged at managed assets hold current insurance, complete site inductions and comply with applicable WHS requirements — as a non-negotiable condition of engagement
- Conduct regular safety walks and precinct inspections to maintain presentation and safety standards at managed assets
- Maintain an emergency management plan and evacuation procedures at all managed assets, reviewed annually
- Ensure essential safety measures, building compliance and fire safety requirements are current and fully maintained at all times

04 Incident Management

4. Incident Management

CPP's incident management requirements are:

- All incidents, near misses and unsafe conditions reported immediately to the relevant CPP manager and, where applicable, to the asset owner using the Incident Report Form.
- Notifiable incidents (serious injuries, dangerous incidents) reported to the Workplace Health and Safety regulator immediately in accordance with WHS legislation
- All incidents investigated to identify root causes and prevent recurrence — investigation reports provided to asset owners within 5 business days
- Corrective actions implemented promptly and their effectiveness monitored
- Incident data maintained and reviewed regularly to identify trends and improvement opportunities

05 Contractor Safety Management

5. Contractor Safety Management

CPP applies rigorous safety requirements to all contractors engaged at managed assets:

- Evidence of current public liability insurance, workers compensation insurance and WHS compliance policies required before engagement
- Mandatory site induction completed by all contractors before commencing work
- Safe Work Method Statements (SWMS) and Job Safety Analyses (JSA) required for all high-risk work
- Contractor safety performance monitored by CPP's on-site team and reported to asset owners
- Non-compliant contractors removed from site and not re-engaged until compliance is demonstrated

06 Psychological Safety

6. Psychological Safety

CPP is committed to the psychological safety and mental wellbeing of all personnel:

- A workplace culture that is respectful, supportive and free from bullying, harassment and excessive pressure
- Open communication channels for personnel to raise concerns without fear of retaliation
- Access to employee assistance and support resources
- Workloads managed to be reasonable and sustainable

07 Accountability

7. Accountability

Stephen Clark, Managing Director, holds ultimate WHS accountability across CPP. All CPP managers are responsible for WHS compliance within their teams and at their managed assets. All CPP personnel are responsible for their own safety and the safety of others in their workplace.

Stephen Clark

Managing Director

CLARK Property Partners Pty Ltd

June 2026

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Review Due: June 2027

Policy Owner: Managing Director, CPP