TODD
CORPORATION

Health Safety and Environment Management System

7 August 2019

Policy documents and ownership

Document title
Health Safety and Environment Management System
Policy group
Group HSE
Related documents
Policy Management System Guidelines
Document owner
Group HSE Manager

The Policy Management System

The Company maintains a set of integrated policies, standards, procedures and guidelines consistent with its Operating Principles.

Alignment with the Group's Operating Principles

This document aligns with the Operating Principles of valuing our people and caring for the environment and community.

Approval signatures

_____   7/8/2019

Owned by – Group Manager HSE   Date

_____   7/8/2019

Approved by – Group Chief Executive Officer   Date

Contents

Health Safety and Environment Management System

1   Introduction

The Health and Safety and Environment Policies require the Group to maintain and continuously improve a Health, Safety and Environmental Management System (HSEMS).

For reference, the HSE incident and KPI reporting definitions standard contains all relevant definitions within the HSEMS.

2   Purpose and application

The purpose of the HSEMS is to provide a controls framework for the identification and management of Health, Safety and Environmental risks in Todd business operations.

The HSEMS is based on international standards and established systems from industrial sectors similar to those in which Todd's businesses operate. It provides a framework for:

a)   effective management of personal and critical hazard safety;

b)   setting HSE objectives and priorities;

c)   establishing clear roles and responsibilities to achieve those objectives;

d)   providing assurance that Todd complies with its legal obligations; and

e)   continuous reduction of risk and improvement in performance.

The primary relevant risks are those to:

a)   critical hazard safety, personal safety, occupational health and public safety;

b)   the environment;

c)   Todd and third-party assets; and

d)   associated business value and reputation.

Critical hazard risk management is a blend of engineering, management and operating disciplines focussed on preventing serious harm to people and / or catastrophic damage to the environment and property. Major incidents are typically the result of multiple systems failures and have high consequence but are uncommon.

Personal safety and occupational health risk management deals with the operational control of task and work condition hazards that can result in injury and illness to employees. Note that the term employee in this standard includes contractors and any person conducting work on Todd controlled sites.

Public safety is the protection of the public from harm resulting from Todd activities.

3   Scope

The HSEMS applies to all activities that are undertaken by Todd Divisions.

4 Roles and responsibilities

Divisional VPs and line management are responsible for implementing the requirements of the HSEMS.

Roles and responsibilities for managing HSE processes shall be assigned, documented and communicated to competent people with appropriate delegated authority.

HSE Managers shall provide support and guidance to management and monitor performance so that requirements can be met.

Oversight of the HSEMS and Health, Safety and Environmental activities will be provided by the Todd Management HSE Committee. That Committee is comprised of:

a)   the Group CEO; and

b)   Divisional VPs.

The Group HSE Manager is the Committee secretary.

Divisional HSE Managers and others as required by the Committee may attend committee meetings.

5 The HSEMS structure

The HSEMS sits within a system hierarchy as shown in diagram 1.
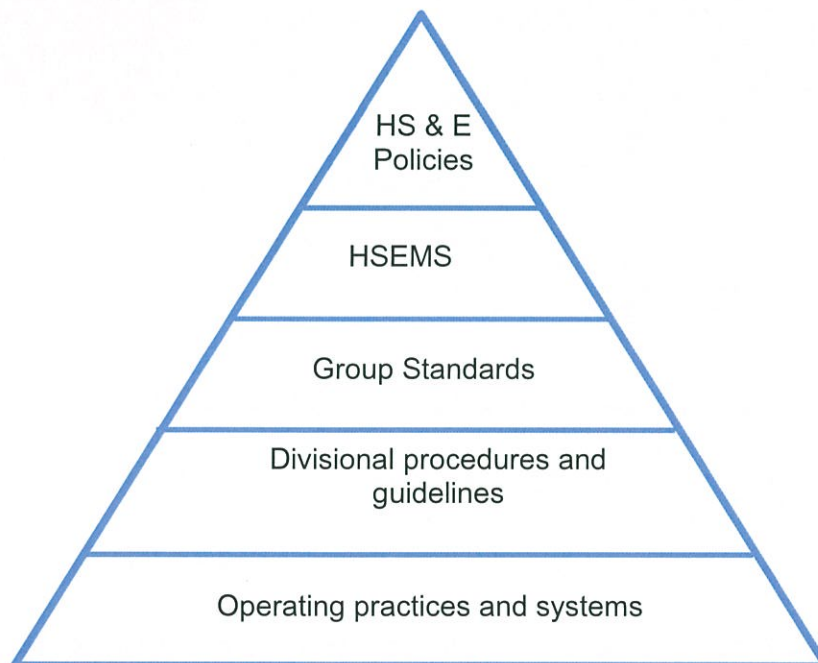

Diagram 1: HSE Management System

The HSEMS consists of 11 Elements, each of which contains requirements that shall be met. Refer to diagram 2 below. The Elements are described in more detail in section 7 below.

Diagram 2: HSEMS Elements

Each HSEMS Element contains a purpose statement, requirement statements and references to supporting documents.

A purpose statement describes the overall intent of the Element and what will be achieved by implementing the requirements in it.

Requirement statements set out the mandatory activities that allow the Element purposes to be achieved.

Supporting documents are Group Standards, Procedures and Guidelines that support the Element.

Group Standards contain mandatory requirements and Procedures and Guidelines set out recommended processes or methods of meeting the Element's requirements.

6 Continuous improvement cycle

The HSEMS shall be subject to a continuous improvement planning cycle. Formal reviews of performance across the HSEMS elements shall inform management of opportunities to improve the HSEMS and compliance with it that can be integrated into annual plans, as shown in diagram 3.

Diagram 3. Continuous improvement cycle

1. Leadership and stewardship
2. Risk management
3. Competence, awareness and responsibility
4. Asset and operational integrity
5. Safe systems of work
6. Incident management
7. Emergency response
8. Occupational health and hygiene management
9. Contractor safety management
10. Environmental management
11. Assurance, Performance review and improvement

System outputs – internal \ external audits, assessments, reviews, investigations

Continuous improvement action plan

Corporate, Division and site objectives, targets, lagging and leading KPIs

Board, SMT and site monitoring, review and management of improvement actions

7 The HSEMS Elements

Element 1	Leadership and stewardship

Purpose: Managers are responsible and accountable for HSE performance and demonstrate leadership and commitment to meeting HSE requirements.

Supporting documents
- Todd Operating Principles
- Health and Safety Policy
- Environment Policy
- Engagement and Consultation Standard
- Non-operated Assets Standard

Requirements

1.1	Policy and strategy	The Todd Corporation Ltd. Board shall set HSE policy and strategy and support it with financial and personnel resources that will enable HSE objectives to be met. The Todd Corporation Ltd. Senior Management Team shall steward implementation and operation of that Policy and Strategy.
1.2	HSEMS commitment	Todd Corporation Directors and Management shall demonstrate commitment to the HSEMS by: a) acquiring knowledge of HSE matters; b) understanding HSE risks within Todd business operations; c) understanding legal requirements and requiring that that they be complied with; d) requiring risks to be managed to as low as reasonably practicable (ALARP); e) embedding continuous improvement in HSE programmes; and f) establishing appropriate HSE governance and assurance processes.
1.3	Annual review and planning	Management shall implement an annual review and planning process to deliver HSE objectives of: a) maintaining or reducing risk to ALARP; b) preventing incidents; and c) continuously improving performance. Performance targets shall be: a) set for lagging and leading KPIs for critical and personal safety risks and milestone objectives; b) documented, communicated and assigned; and c) monitored, benchmarked, reported and reviewed.

1.4	Management roles and responsibilities	Management shall assign HSE responsibilities. Responsibilities shall be communicated and documented. Roles shall have clear reporting relationships and manageable spans of control. All employees shall be responsible for HSE performance requirements within their roles.
1.5	Employee support and engagement	Management shall: a) establish and support safety committees for employee engagement and issues management; b) communicate, inform, consult and engage with employees so that HSE requirements can be achieved; c) require employees to report all incidents; d) encourage employees to report hazards and improvement opportunities; and e) recognise positive contributions to HSE performance.
1.6	Non-operated assets	Management shall undertake due diligence assessments of operating party HSE capability. Non-operated joint venture arrangements shall have an Operating Agreement or similar that includes HSE performance and reporting requirements of the operator, consistent with Todd's own requirements. The operator shall have a process for reporting, as a minimum, on the outcome of HSE audits, lagging and leading KPI measures, incidents and emergency capability. Todd shall assign a responsible person to monitor the HSE performance of the operator.
1.7	Government and community relations	Management shall have a process to communicate and consult with relevant associations, community groups and government agencies so that the Todd Group can contribute to the development of industry codes of practice, public policy and relevant legislation.

Element 2	Risk management

Purpose: HSE risk control is integrated into management and operational decision making.

Supporting documents
- Group HSE Risk Management Standard
- Todd Group HSE Risk Matrix
- ALARP Guidelines
- Management of Change Standard

Requirements		
2.1	**Hazard identification and risk assessment**	Management shall implement a hazard identification and risk assessment process for each operating site and workplace that includes:
		a) systematically and proactively identifying hazards associated with operations, plant, equipment and personal factors;
		b) determining the inherent risk associated with a hazard;
		c) identifying and implementing controls required to reduce risk to ALARP;
		d) an assessment of the controlled (residual) risk;
		e) maintaining a hazard and risk register for each work site; and
		f) consulting with those exposed to the hazards during the hazard and risk identification and assessment process.
2.2	**Risk classification**	HSE risks shall be classified according to the Todd Group HSE Risk Matrix. The risk classification shall determine the level of authorisation required and risk review frequency.
2.3	**Risk authorisation**	Critical risks (Severe and High) assessed as not ALARP shall be authorised at a management level in accordance with the Todd Group HSE Risk Matrix and an action plan shall be developed to reduce the risk to ALARP.
2.4	**Management of change**	Management shall assess the need for a management of change process for both permanent and temporary changes to equipment, substances, materials, operations, systems or process, organisation structure, employees in roles identified by the Division as safety critical and regulatory requirements. When it is determined that a management of change process is required, the formality of the process will be determined by the scale and complexity of the change.

2.5	**Risk controls**	Risk controls shall be implemented according to the hierarchy of control principles found in the HSE Risk Management Standard. Management shall have a process to assess and verify that risk controls are effectively implemented and maintained and to identify and implement any additional controls required to achieve ALARP.
2.6	**Risk training**	Employees shall be provided with hazard and risk awareness training relevant to their roles and areas of operation to allow them to work safely.
2.7	**Risk documentation**	Hazard and risk information shall be documented in: a) a hazard and risk register for each site, recording the nature of the hazard, the potential consequences and their controls; b) procedures, project documentation; and c) training and guidance materials. Site hazard and risk registers shall be aggregated into Divisional Risk Registers for all risks. A Group Risk Register shall be maintained for all critical risks (severe and high risks).
2.8	**Security**	Security assessments shall be undertaken, and risk-based controls implemented to protect Todd assets and employees working on and off-site and the public in the vicinity of Todd facilities and activities.

Element 3	Competence, awareness and responsibility

Purpose: Employees understand their HSE roles and responsibilities. They are competent and engaged with so that they can meet operational health, safety, environmental and legal compliance requirements.

Supporting documents
- Position descriptions
- Performance agreements
- HSE Engagement and Consultation Standard

Requirements

3.1	**Employee roles and responsibilities**	Employee HSE roles, responsibilities and accountabilities shall be clearly documented and communicated. Employee contribution to HSE performance shall be assessed as part of the annual appraisal process.
3.2	**Role competency**	Specific competencies required to meet HSE objectives, including qualifications or certification requirements shall be identified and documented. Management shall implement a process of screening, verifying and monitoring employees so that work is only performed by people who are competent or suitably supervised. Management shall have a process for identifying and managing roles which are critical to safe operation of plant.
3.3	**Induction and awareness training**	Employees shall receive general and site specific HSE awareness inductions relevant to their roles that includes: a) HSE policies; b) legislative requirements; c) relevant operating hazards and risk controls; d) procedures and practices; and e) the obligation to cease and report any unsafe work.
3.4	**Training and development**	Employees shall be provided with training relevant to their roles by competent trainers, to allow HSE objectives to be met.
3.5	**Employee participation**	Safety committees and other relevant two-way communication processes shall be agreed and developed between management and employees that enable cross sectional representation in HSE matters.
3.6	**Employee records**	Employee records shall be maintained of roles and responsibilities, certificates and licences, training attainment and performance, in accordance with relevant regulatory requirements including privacy legislation.

Element 4	Asset and operational integrity

Purpose: facilities and assets are designed, operated and maintained throughout their life cycles to ensure they are fit for purpose and safe to operate.

Supporting documents
Safety Critical Equipment Guidelines

Requirements		
4.1	Asset risk and design	Asset development and asset management projects shall have clear objectives and assigned roles and responsibilities commensurate with the scale and complexity of the project. A formal project management process shall be used, which includes: a) appropriate risk assessments and hazard studies, for new and modified assets, during all stages of the project; and b) a post commissioning procedure to ensure design specifications are met. Deviations in design scope shall be managed through an authorisation process involving subject matter experts and management. At the earliest practicable stage of a project the principles of inherently safe and ergonomic design shall be established to reduce risk to ALARP during: c) start-up; d) normal operations; e) routine shutdown; f) routine maintenance; g) major maintenance; h) emergency operation; and i) emergency shutdown.
4.2	Operator acceptance	End users shall be engaged during a project to ensure that HSE and operational requirements are identified and can be met. Prior to formal handover there shall be a pre-commissioning process and all manuals, plans, drawings and procedural documents shall be made available and training provided to operations management and operators covering: a) operating limits; b) system monitoring; c) inspection regime; d) preventive maintenance requirements;

		e) response to unplanned and unexpected alarms, process upsets, system failures and shutdowns including an escalation process, and f) emergency procedures.
4.3	**Asset inspection and maintenance**	A planned and documented inspection and maintenance programme shall be implemented to ensure that assets remain safe and fit for service through their life cycles. Records shall be kept and periodically reviewed to verify that maintenance is being performed to the required standard. A risk assessment process shall be implemented to manage any deferral of maintenance of safety critical assets. A recommissioning process shall be in place to ensure assets are fit to return to service after maintenance or shut downs.
4.4	**Asset operation**	A governance process shall be implemented to verify that equipment is operated within defined limits, manufacturing specifications or design standards. Records shall be kept of tests and inspections of performance.
4.5	**Safety critical equipment**	There shall be a process to identify safety critical equipment, which shall be subjected to a specific programme to maintain integrity, functionality and performance. There shall be a process to determine the requirement for maintaining an inventory of spare parts for safety critical equipment.
4.6	**Disarming safety systems**	A process shall be implemented to identify and control the risks arising from temporarily disarming or deactivating critical alarms, control and shutdown equipment.
4.7	**Non-conforming assets**	Excursions outside safe operating limits, defects and unexpected structural, mechanical or electrical failures or emergency shutdowns shall be reported, investigated and corrective actions taken.
4.8	**Procurement**	Suppliers shall be selected and monitored for their ongoing ability to provide materials and services that meet HSE and operational requirements. A process shall be implemented to procure, receipt, inspect and test, as relevant, equipment, materials or supplies to ensure they meet specifications, legal requirements and HSE standards and that they are appropriately stored and maintained until required. Non-conforming materials shall be managed to ensure they are not utilised or put into operation.

		Any replacement of parts that is not like for like shall be subject to a change management process.
4.9	**End of life assets**	Assets which are mothballed, decommissioned or abandoned shall be left in a state which is safe and meets regulatory environmental requirements.
4.10	**Asset records and documents**	All documents related to assets shall be managed to ensure that they are secure, accessible, legible, current and accurate. This includes hazard studies and risk assessments, manufacturer's specifications, certificates, drawings and plans, operating instructions, maintenance requirements and maintenance, test and inspection records.

Element 5	Safe systems of work

Purpose: HSE requirements are integrated into planning, scheduling, resourcing and executing work to ensure activities are undertaken safely and legally.

Supporting documents
- Safe Systems of Work Standard
- Confined Space Entry Guidelines
- Excavation and Ground Disturbance Guidelines
- Lifting Operations Guidelines
- Safe Isolation of Work and Equipment Guidelines
- Lone Worker Guidelines
- Safe Driving Standard
- All-terrain Vehicle Standard
- Firearms Safety Standard

Requirements

5.1	**Operating risk assessment**	Routine and non-routine task risks shall be identified and systematically managed to ALARP.
5.2	**Routine operating procedures**	Routine operations shall have documented standard operating procedures: a) that document hazards, risks and their controls; b) based on the way work is actually performed; c) that are current, accurate and accessible to users; d) communicated to employees; e) monitored to verify use; and f) reviewed periodically to ensure fitness for purpose.
5.3	**Non-routine activity management**	Non-routine operations shall be systematically planned and scheduled and subjected to a work permitting process that includes: a) a risk assessment by subject matter experts and those performing the task; b) a safe work method plan; c) employee and equipment resource requirements; d) employee engagement and communications; e) documentation and authorisation of the plan; f) regulatory notifications where relevant; and g) use of the required legislative documentation system.
5.4	**Unsafe work**	All employees shall be made aware of their obligation to stop work when an unsafe condition exists and to notify management. Management shall investigate and address unsafe working conditions prior to work commencing or recommencing.

Element 6	Incident management

Purpose: all health, safety and environmental incidents are systematically managed through a post incident process, to prevent recurrence through shared learning and continuous improvement activities.

Supporting documents
- Incident Reporting and Investigation Standard
- HSE Incident and KPI Reporting Definitions

Requirements

6.1	Incident recording and reporting	HSE incidents and near misses involving Todd operations or employees shall be accurately and promptly reported and recorded.
6.2	Incident investigation	Incidents shall be investigated by a competent investigator, using recognised methods commensurate with the nature of the incident and its actual or potential consequence.
6.3	Regulatory notifications	A process shall be implemented to ensure that regulatory authorities are notified of incidents and regulator instructions complied with in accordance with relevant legislative requirements.
6.4	Action management	Management shall assign responsibilities for corrective actions arising from incident investigations. Actions shall be time bound and tracked to closure.
6.5	Lessons learned	Lessons learned from company and external incidents or near misses shall be shared across the Group and contribute to the development of continuous improvement plans where relevant.
6.6	KPI reporting	Summary HSE incident data shall be reported to management and employees on a regular basis.
6.7	Trend analysis	Incident data shall be periodically analysed, at least annually, to identify trends and risk reduction opportunities. Preventive actions shall be implemented to address trends commensurate with the risk.
6.8	Records management	Incident records shall be maintained in a database that enables review, analysis and reporting.

Element 7	Emergency response

Purpose: the Todd Group is able to respond to HSE emergencies and associated crises, to promptly mitigate the impacts and effectively manage recovery of operations.

Supporting documents
- Group Emergency Response Plan
- Divisional HSE emergency response plans
- Site emergency response plans

Requirements

7.1	Emergency response planning	The Todd Group and each operating Division shall undertake emergency response planning and have an escalating, tiered and scalable emergency response plan capable of responding to emergencies relevant to its' activities.
7.2	Risk based emergency planning	Operating Divisions shall develop scalable scenario and risk-based emergency plans for all operations and facilities and in accordance with regulatory requirements.
7.3	Emergency plans	Emergency response plans shall document the response to relevant emergency scenarios, including employee and equipment resources, internal and external communications and logistics.
7.4	Emergency training	Employees shall be trained to respond effectively to emergencies, including activation of emergency systems, deployment of response equipment, evacuation and first aid medical treatment.
7.5	Mutual aid	Management shall have a process to establish mutual aid arrangements to support emergency responses where identified through the planning process.
7.6	Response testing	Emergency response plans shall be validated at least annually through exercises and drills, to verify employee response capability and equipment readiness.
7.7	Response review	Emergency response plans shall be reviewed following exercises, an incident requiring deployment of emergency equipment or on at least an annual basis.
7.8	Response equipment	Emergency response equipment and resources shall be maintained in a state of readiness.

Element 8	Occupational health and hygiene management

Purpose: the health of people at work is protected through the control of workplace and occupational health hazards and monitoring the health of those who are exposed to them.

Supporting documents
- Industrial Hygiene and Occupational Health Standard
- Industrial Hygiene Guidelines
- Fatigue Management Guidelines
- Fatigue Management Toolbox
- Drug and Alcohol Standard
- Hazardous Substances Standard

Requirements		
8.1	**Health hazard assessment**	Occupational health hazards shall be systematically assessed by a competent person for chemical, physical, biological, ergonomic and psychosocial hazards. Health risks shall be periodically reviewed to evaluate the effectiveness of risk controls. The potential health risks from new processes, equipment or substances shall be assessed through a management of change processes.
8.2	**Hazardous substance management**	Hazardous substance risk shall be managed in accordance with regulatory requirements, to protect employees and the public from harmful exposures by: a) maintaining the integrity of storage, transfer and transport systems; b) providing training in product knowledge and safe hazardous substance handling; c) maintaining accurate and up to date hazardous substances registers, inventories and safety data sheet records that are available as required; and d) ensuring that labels, signs and placards are legible and accurate.
8.3	**Health risk control**	Any health hazards identified shall be managed through a management plan that includes implementation of controls, monitoring, assessing and annual review. Health risks shall be documented, and information provided to employees detailing: a) the hazards and the required controls; and b) personal exposure monitoring and health surveillance requirements.

8.4	**Health monitoring**	Personal and workplace exposure monitoring shall be conducted by a competent person using established sampling and assessment techniques.
8.5	**Facilities and amenities**	Facilities shall be provided to employees that are habitable, sanitary, provide adequate comfort, shelter and amenities and comply with legal requirements.
8.6	**Health screening**	Management shall have a process to determine if employees require pre-employment health screening and health monitoring. Where this is a requirement, health assessments shall be overseen by a competent medical professional.
8.7	**Impairment**	Management shall have a process to verify that employees are not impaired by drugs or alcohol, fatigue or stress. Employees shall be provided with information that enables them to understand their personal responsibilities and accountabilities for managing their own well being and compliance with drug and alcohol requirements.
8.8	**Injury management**	Employees injured at work shall be supported with prompt and on-going medical intervention to aid recovery and return to work as early as reasonably practicable.
8.9	**Health support**	Employees with non-work related medical conditions or disabilities shall be supported at work to ensure that they can work safely.
8.10	**Health records**	Health monitoring and assessment records shall be stored and retained in accordance with relevant privacy legislation and made available to employees on request.

Element 9	Contractor safety management

Purpose: services and equipment provided by contractors meet Todd requirements for HSE compliance and contractual obligations.

Supporting documents: none

Requirements		
9.1	**Contractor management**	Management shall have a process to manage operations performed by contractors to ensure that Todd HSE requirements are met, and risk is ALARP.
9.2	**Contractor selection and engagement**	A process shall be applied for the evaluation and selection of contractors which considers: a) the length of the contract; b) the number of deployed contractors; c) the associated HSE risks; d) the nature of the work, services or products being supplied; and e) the contractor's ability to meet HSE and legal requirements.
9.3	**Contractor requirements**	Contractor requirements shall be agreed, documented and clearly communicated to the people undertaking the work, including: a) how Todd HSE performance requirements shall be met, particularly in situations where there are shared responsibilities on a site b) provision of competent, fit for duty employees; c) providing compliant and fit for purpose equipment; d) a process for monitoring performance verification of current certificates, and licenses; and e) the management of sub-contractors to Todd requirements.
9.4	**Contractor operations**	Contractors shall, where applicable, be required to: a) report HSE KPI performance information meeting Todd requirements; and b) manage operational activities, including simultaneous operations and associated risks in accordance with Todd requirements.
9.5	**Contract performance**	Contractor performance shall be monitored and performance to contract verified or corrected. At the conclusion of a contract or on an annual basis, the HSE performance of the contractor shall be assessed commensurate with the size and complexity of the contract or the risks associated with the work being undertaken.

Element 10	Environmental management

Purpose: Todd aims to achieve excellence in environmental performance, efficiently use its natural and physical resources and, through good environmental practices, have a positive impact on its operating environments.

Supporting documents
- Environment Policy
- Environment Standard
- Environment Reporting KPIs

Requirements

10.1	Efficient use of resources	Facilities and activities shall be planned, designed and operated with consideration for: a) efficient use of resources and generation of waste; b) mitigation of adverse effects on the environment to ALARP; and c) recognition of cultural, community and amenity values.
10.2	Regulatory permits	Prior to undertaking or changing any operational activity all necessary regulatory licences, consents and permits shall be obtained and they shall be complied with throughout the lifecycle of the operation.
10.3	Resource efficiency	Site operations shall be periodically reviewed to assess opportunities to use land, water and energy resources efficiently and to ensure environmental effects are ALARP.
10.4	Land management	Where applicable, land shall be assessed for contamination and, if necessary, rehabilitation management plans implemented to meet regulatory requirements including the monitoring, testing, treatment, transportation and or disposal of contaminated material.
10.5	Emissions management	Air emissions shall be monitored against relevant air quality standards, to ensure compliance and to reduce adverse effects of air pollution to ALARP.
10.6	Water use	Operations shall undertake water abstraction, water production, use and discharge on land in accordance with regulations, licenses, consents and permits.
10.7	Water monitoring	Water abstraction and use shall be monitored and recorded in accordance with regulatory requirements.
10.8	Noise and other effects	Operations shall monitor noise levels and other impacts on amenities and communities and implement mitigation measures in accordance with regulatory requirements.
10.9	Records management	Environmental monitoring records shall be stored, retained and secured in accordance with regulatory requirements.

Element 11	Assurance, performance review and improvement

Purpose: HSEMS performance is assessed and reviewed, continuous improvement opportunities identified and integrated into the annual planning cycle.

Supporting documents
HSE Audit and Assurance Standard

Requirements		
11.1	**Audits and assurance**	HSE audits shall be undertaken, to provide assurance to the Todd Corporation Ltd. Board that HSEMS requirements are met by each Division, its operations and its worksites, including offices. Assurance shall be determined by the degree to which each HSEMS requirement has been implemented, responsibilities assigned and reviewed to verify effectiveness. The frequency and scope of HSE assurance assessments shall reflect complexity of the operation and the level of risk.
11.2	**Critical risk assurance audit**	Critical risks, as determined by application of the Todd Group Risk Matrix, shall be audited annually to assure the presence and effectiveness of preventive and mitigation barriers and the results reported to senior management and the Todd Corporation Ltd. Board.
11.3	**Corrective action management**	Corrective actions shall be identified through reviews of audits, inspections, risks and incidents and evaluated to determine remedial actions. Actions shall be prioritised, assigned and monitored to verify that they are closed out in a timely manner and are effectively implemented.
11.4	**Performance review**	HSE performance shall be based on established lagging and leading KPIs, reviewed by management to evaluate continuous improvement opportunities for incorporation into annual plans.
11.5	**Continuous improvement**	Continuous improvement planning shall include allocation of resources, assignment of responsibilities, management of change assessment, action monitoring and evaluation of performance improvements.