

WORK HEALTH AND SAFETY POLICY

VERSION: 2.0

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1. INTRODUCTION

1.1 Purpose

Sydney Markets Limited (SML) is committed to providing a safe and healthy environment for all workers and visitors. The purpose of this policy is to outline the work health and safety (WHS) commitment and relevant WHS responsibilities for SML and others within SML site, including tenants, contractors, visitors, buyers, and members of the public.

1.2 Scope

This policy applies to all SML workplaces, including offices, all SML-managed sites, including Flemington and Haymarket, and covers all operational activities, infrastructure, and shared spaces under SML's control or influence.

1.3 Policy References

This policy was developed with references to the following documents and/or legislation:

Document Name	Link
Work Health and Safety Act 2011 (NSW)	Work Health and Safety Act 2011 No 10 - NSW Legislation
Work Health and Safety Regulation 2017 (NSW)	Work Health and Safety Regulation 2017
Incident Management Policy	Incident Management Policy v1.2.pdf
Risk Management Framework	Enterprise Risk Management Framework v1.0.pdf
SML Code of Conduct	Under Review
SML Market Rules and associated documents	Available on SML website
SML Conditions of Entry and associated documents	Available on SML website

1.4 Definitions

Term	Definition
Workplace	The physical area managed by SML, offices, including market halls, market plaza, loading docks, car parks, and public access zones.
Work Health and Safety Risk	Any condition or activity (physical or psychosocial) that could result in harm to individuals or damage to property.
Shared Space	Areas where pedestrian and vehicular traffic intersect or co-exist.
Critical Infrastructure	Essential systems and utilities managed by SML, including power, water, and communications.

Term	Definition
Person Conducting a Business or Undertaking (PCBU) – Legal Obligations	<p>Compliance with the <i>Work, Health and Safety Act 2011</i> is mandatory. All duties under the Act must be fulfilled, including those of officers, workers, and other persons at the workplace. PCBU can be legal entities such as companies, partnerships and unincorporated associations, government departments, public authorities, volunteer organizations that employ workers, sole traders, and self-employed persons.</p> <p>As a Person Conducting a Business or Undertaking (PCBU) must:</p> <ul style="list-style-type: none"> • Take all reasonably practicable steps to ensure the health and safety of workers, contractors, tenants, visitors, and members of the public within their site. • Engage in meaningful consultation with workers, tenants, and contractors on safety matters, particularly when identifying hazards, assessing risks, and implementing controls. • Provide appropriate safety information, induction training, and supervision to ensure all persons understand and comply with safety requirements. <p>Maintain safe systems of work, including documented procedures, emergency plans, and risk controls. Ensure their physical environment is free from hazards and conducive to safe operations.</p>
Notifiable Incidents	Incidents as per the WHS regulatory requirements of Notifiable Incidents NSW.
Officers	<p>SML Board members, CEO and CEO's direct reports.</p> <p>Officers can also be other leaders per the criteria defined in the <i>Work, Health and Safety Act 2011</i> such as business unit heads.</p>

2. POLICY STATEMENT

SML is committed to maintaining a safe healthy and resilient environment through proactive risk identification, mitigation, and continuous improvement of safety controls. Compliance with applicable WHS legislation is a core obligation. SML promotes a culture of shared responsibility among all PCBUs including employees, contractors, transporters, tenants, and visitors.

The Board of Directors and senior management of SML acknowledge their duty to exercise due diligence in relation to WHS and are committed to providing the leadership, resources, and governance necessary to uphold the highest standards of health and safety across all operations.

3. POLICY COMMITMENTS

SML is committed to:

- Complying with relevant health and safety legislation, regulations, and relevant codes of practice.
- Providing and maintaining a safe work environment.
- Providing consultative arrangements for employees and their representatives to invite constructive input into the decision-making processes that impact upon their work health and safety.
- Identifying WHS risk and implementing appropriate control measures to eliminate or minimise risks to health and safety, so far as is reasonably practicable.
- Monitoring, reviewing, and updating risk assessments and control measures for appropriateness.
- Maintaining appropriate reporting and recording of near miss, hazards, incidents, and injuries.
- Providing appropriate WHS information and training for workers and visitors.
- Ensuring all workers have access to SML WHS policies and procedures; and
- Providing rehabilitation programs to support workers who experience a workplace injury or illness.

4. ROLES AND RESPONSIBILITIES

Effective implementation of this Policy requires clear accountability across all levels of SML and its tenants. The following roles and responsibilities apply:

Role	Responsibilities
Board of Directors and Officers	<p>The Board provides strategic oversight of WHS risk management across SML. It reviews performance reports, incident trends, and emerging risks to ensure safety remains a priority at the governance level.</p> <p>Exercise due diligence to ensure that SML complies with its health and safety obligations. This is a personal and continuous duty that requires Officers to take proactive steps to discharge this duty. Establish and maintain a governance structure for managing health and safety of workers and visitors</p>
Head of Safety	<p>Responsible for SML WHS strategy, the Head of Safety ensures compliance with legislation and relevant Codes of Practice. This role involves implementation of WHS requirements, reporting safety performance to the Executive Leadership Team and Board, leading continuous improvement initiatives, and driving cultural change through targeted programs and stakeholder engagement.</p>

Role	Responsibilities
Managers	<ul style="list-style-type: none"> • Promote and implement SML's health and safety policies and procedures. • Ensure appropriate resources are in place to enable SML to comply with its WHS obligations. • Be responsible for taking practical measures to ensure physical and psychological health and safety risks are managed within their business unit. • Ensure systems are in place to regularly monitor, measure and report on health and safety performance. • Provide workers and visitors with appropriate information, training, and supervision. Consult with workers on matters relating to health, safety, and wellbeing.
Employees	Employees are responsible for complying with safety procedures, signage, and instructions. They must actively participate in WHS training and emergency drills, report hazards and incidents promptly, and contribute to consultation processes and safety improvements within their work areas.
Tenants and Contractors	Tenants and contractors must comply with WHS legislation, site-specific protocols, and contractual obligations. They are required to submit Safe Work Method Statements (SWMS) for high-risk activities, obtain permits to work, and participate in site inductions, audits, and emergency drills. Cooperation with SML and other duty holders is essential to managing shared risks.
Visitors and Buyers	Visitors and buyers must follow site safety signage, instructions, and designated pathways. They are expected to comply with crowd control measures and emergency procedures, and report any unsafe conditions or incidents to SML staff or security personnel

5. NON-COMPLIANCE AND CONSEQUENCE

All workers are expected to understand and comply with this policy. A lack of awareness will not be accepted as a justification for non-compliance. SML will apply these consequences consistently and fairly, in accordance with its WHS Management System and legal obligations.

Non-compliance with this Policy will be dealt with in a manner that is proportionate and reasonable for the seriousness of the matter. Should any worker or tenant be found to be engaging in behaviour that is prohibited by this Policy or is contrary to any reasonable direction, that person will be the subject of appropriate action (as determined by SML at its absolute discretion).

6. POLICY IMPLEMENTATION

The requirement of this policy will be implemented through awareness training including available online training modules, induction, and other modes of consultation and communication such as team meetings and town hall.

7. REVIEW AND AMENDMENT

This policy will be reviewed by the Policy Owner as per the review date or sooner if there are changes in legislation, operational practices, or significant incidents.

DOCUMENT ADMINISTRATION INFORMATION

Document Title	Work Health and Safety Policy
Policy Category	High Risk
Version	2.0
Approval Authority	Chief Executive Officer
Approval Date	12/03/2026
Effective Date	12/03/2026
Policy Owner	Interim Head of Operations
Issuing Department	Work Health and Safety
Review Date	Three years from approval date

DOCUMENT REVISION HISTORY

Version	Date	Author	Description of changes
1.0	10 Nov 2025	Shailendra Tripathi – Head of Safety	First draft
1.0	23 Nov 2025	Catherine Roche – EA to the CEO	Amendments to refine document formatting (no changes to content).
1.0	24 Dec 2025	Chief Executive Officer	Approved
2.0	12 March 2026	SML Board	Amendments to change the approval from CEO to SML Board, Approved