

FRANMARINE

Integrated Health, Safety, Environment and Quality Policy

OUR COMMITMENT

Franmarine is committed to the health, safety, and wellbeing of every person who works with us; to protecting the marine environments in which we operate; and to delivering consistent, high-quality outcomes to every client. These are not aspirations — they are operating standards to which every Franmarine employee, contractor, and leader is held accountable.

1. Purpose and Scope

This Integrated HSEQ Policy establishes Franmarine's organisation-wide commitment to health, safety, environment, and quality management. It applies without exception to all Franmarine employees, contractors, subcontractors, labour hire workers, and visitors across all operational locations and project sites, including:

- Henderson, Western Australia (13 Possner Way)
- Banksmeadow, New South Wales (32/75 Corish Circle)
- Any future international locations, including a prospective United Kingdom presence

The scope of this policy covers the full range of Franmarine services: commercial diving operations; in-water hull cleaning and biofouling management; mooring installation, inspection and maintenance; underwater infrastructure inspection; Defence vessel sustainment; and workshop operations.

Exclusion — ISO 9001:2015 Clause 8.3 (Design and Development of Products and Services) Franmarine Underwater Services Pty Ltd does not engage in the design or manufacture of products. All services delivered by Franmarine are defined by client specifications, applicable classification society requirements, regulatory standards, and established Franmarine procedures. Accordingly, the requirements of ISO 9001:2015 Clause 8.3 are excluded from the scope of the Quality Management System in accordance with Clause 4.3. This exclusion does not affect Franmarine's ability or responsibility to provide services that conform to applicable requirements.

No exclusions are claimed from ISO 14001:2015 or ISO 45001:2018.

This policy sits at the apex of the Franmarine policy framework and is underpinned by HSE-MAN-001 (HSEQ Management Manual) and the Franmarine HSEQ Standards Framework (FRA-STA-001 to FRA-STA-015).

2. Our Commitments

ZERO HARM Health & Safety	We will provide safe and healthy working conditions for the prevention of work-related injury and ill health. We apply the hierarchy of controls to all operational hazards, conduct formal risk assessments prior to all high-risk work, and actively maintain our lost-time injury-free status. Every person working with Franmarine has the right — and the responsibility — to cease any task they consider unsafe, without fear of reprisal.
RISK Risk Management	We will systematically identify hazards, assess risks, and implement effective controls across all operations. This includes diving-specific hazards, marine environment risks, plant and equipment and psychosocial hazards. Risk management is conducted in accordance with AS/NZS ISO 31000:2018 and documented through SWMS, JHEA, and STEMS.
LEGAL Legislative Compliance	We will comply fully with all applicable legislation, regulations, standards, and contractual obligations, including the WHS Act 2020 (WA), WHS Act 2011 (NSW), AS/NZS 2299.1:2015, ISO 9001/14001/45001, MARPOL, and all obligations arising from DISP membership and Defence contracts. Our Legal Register (HSE-MAN-004G) is maintained and reviewed no less than annually.
PEOPLE Our People	We will protect the physical and psychological health and wellbeing of all personnel. We are committed to preventing workplace harassment, discrimination, and bullying; managing fatigue; supporting rehabilitation and return to work; and fostering a culture of psychological safety and mutual respect consistent with FRA-POL-005, FRA-POL-008, and FRA-POL-009.
CONSULT Worker Consultation	We will actively consult with and involve our workers in hazard identification, risk assessment, procedure development, and HSEQ improvement. Consultation occurs through daily pre-starts, weekly toolbox talks, monthly safety meetings, HSEQ committee meetings, and STEMS. Workers will be consulted on all policy and procedure reviews in accordance with ISO 45001:2018 Clause 5.4.
REPORT Incident Reporting	We will foster and protect a positive reporting culture. All incidents, near misses, hazards, and non-conformances must be reported through STEMS without adverse consequence. Every reportable event is investigated to root cause, with corrective actions assigned, tracked, and shared as lessons learned across the organisation.
TRAIN Training & Competency	We will ensure all personnel have the training, qualifications, and supervision required to perform their roles safely. All diving personnel hold current ADAS certification, diving medical, first aid, CPR, and oxygen provider certification. Training requirements and records are managed through HR-PRO-002 and FRA-STA-007.
ENVIRONMENT Environment	We will protect the marine and terrestrial environments in which we work. This includes preventing pollution, managing waste in accordance with OPS-PRO-011, capturing biofouling waste through the Enviocart system, tracking environmental compliance via MarineStream™, and maintaining full compliance with our ISO 14001:2015 certified Environmental Management System.
QUALITY Quality	We will deliver consistent, compliant, and high-quality outcomes to all clients through our ISO 9001:2015 certified Quality Management System. We maintain zero non-conformance reports from clients, respond promptly to all customer requirements and feedback, and continuously improve our service delivery processes in accordance with FRA-STA-012.
IMPROVE Continuous Improvement	We will continually improve the suitability, adequacy, and effectiveness of this management system. Improvement opportunities are identified through internal and external audits, incident investigations, management review, and worker consultation. Objectives and targets are set, tracked, and reviewed annually in accordance with HSE-MAN-004H.

3. HSEQ Objectives and Targets

This policy provides the framework within which Franmarine establishes, monitors, and continuously improves its HSEQ objectives and targets, consistent with ISO 9001:2015 Clause 6.2, ISO 14001:2015 Clause 6.2, and ISO 45001:2018 Clause 6.2. All HSEQ objectives are:

- Consistent with the commitments set out in this policy
- Measurable, with defined targets tracked against monthly performance data
- Communicated to all relevant personnel at the functions and levels to which they apply
- Monitored through STEMS and reported to senior management on a quarter basis
- Reviewed and updated as part of the annual management review process

Current annual HSEQ objectives and targets — covering commercial performance, quality, environmental compliance, and safety — are documented in HSE-MAN-004H (HSEQ Objectives and Targets Scoreboard) and are the responsibility of the HSEQ Manager in conjunction with the CEO and Operations Managers.

4. Communication, Availability and Review

Franmarine ensures this policy is communicated to, understood by, and accessible to all workers and relevant interested parties, consistent with ISO 9001:2015 Clause 5.2.2, ISO 14001:2015 Clause 5.2, and ISO 45001:2018 Clause 5.2.

Communication Method	Detail
Induction	All new employees, contractors, and transferred workers receive this policy prior to commencing operational duties
Pre-starts and toolbox talks	HSEQ commitments are reinforced at daily pre-start meetings and weekly toolbox talks at all sites
Safety meetings	Policy performance is reviewed at monthly HSEQ committee and safety meetings
Notice boards	Displayed at all Franmarine workplaces including Henderson WA and Banksmeadow NSW
STEMS	Accessible to all workers through the Franmarine HSEQ information management system
HSEQ Alerts	Urgent policy updates or compliance matters communicated to all relevant personnel without delay
External availability	Available to clients, regulatory authorities, certification bodies, contractors, and other interested parties via the company website and on request

This policy will be formally reviewed at least annually or following any significant change in legislation, operational scope, serious incident, or adverse audit finding. Workers will be consulted as part of any review process consistent with ISO 45001:2018 Clause 5.4.

6. Legislative and Standards Framework

This policy has been developed with reference to the following legislation and standards. Compliance obligations are maintained in the Franmarine Legal Register (HSE-MAN-004G), reviewed no less than annually.

Legislation / Standard	Application to Franmarine Operations
WHS Act 2020 (WA) / WHS Act 2011 (NSW, Cth)	Primary duty of care; officer obligations; incident notification; right to cease unsafe work; worker consultation
WHS (General) Regulations 2022 (WA)	Hazardous work; commercial diving; confined space; plant and equipment; health monitoring
AS/NZS 2299.1:2015 — Occupational Diving Operations	Safety standards for all commercial diving; supervisor and diver competency requirements
AS/NZS 2815 — Training of Occupational Divers	ADAS certification requirements across all diving classifications
IACS UR Z17 — In-Water Survey Requirements	International classification society standard underpinning all IWS approvals (ClassNK, BV, DNV, ABS, LR, RINA)
BV Rule Note NR 533 — In-Water Survey	Bureau Veritas specific requirements for IWS service supplier approval
DNV-CP-0628 — In-Water Survey Programme	DNV class programme underpinning Franmarine's DNV IWS approval (AOSS0000K01)
ABS	American Bureau of Shipping specific requirements for in-water survey service supplier approval, underpinning Franmarine's ABS IWS approval (23-5743234-A)
NKK	Nippon Kaiji Kyokai specific requirements for in-water survey service supplier approval, underpinning Franmarine's ClassNK IWS approval (08IW024)
Lloyds	Lloyd's Register specific requirements for in-water survey service supplier approval, underpinning Franmarine's LR IWS approval (LR23409183AS)
ISO 9001:2015 — Quality Management Systems	DNV certified; customer focus; process approach; quality objectives; continual improvement
ISO 14001:2015 — Environmental Management Systems	DNV certified; aspects and impacts register; compliance obligations; environmental objectives
ISO 45001:2018 — OHS Management Systems	DNV certified; hazard identification; risk controls; worker participation; OH&S objectives

AS/NZS ISO 31000:2018 — Risk Management	Risk management framework for all Franmarine operational risk assessment activities
MARPOL Annex V & VI	Marine pollution prevention; biofouling management; vessel operations environmental compliance
EPBC Act 1999 (Cth) / EP Act 1986 (WA)	Environmental protection; protected species obligations; environmental impact assessment
Defence Industry Security Program (DISP)	Security obligations; personnel clearances; Defence Security Principles Framework
Marine Safety (DCV) National Law Act 2012	Domestic commercial vessel safety; crew certification; vessel survey obligations
Sex Discrimination Act 1984 / EO Act 1984 (WA)	Prevention of workplace discrimination, harassment, and bullying obligations
Privacy Act 1988 / Privacy Amendment Act 2024	Personal information handling; Notifiable Data Breaches; international operations (GDPR)

Accreditation	Issuing Body	Certificate Number	Valid Until
ISO Management System Certification			
ISO 9001:2015 Quality Management	DNV Business Assurance	274353-2018-AQ-AUS-JAS-ANZ	30 Jul 2027
ISO 14001:2015 Environmental Management	DNV Business Assurance	274354-2018-AE-AUS-JAS-ANZ	30 Jul 2027
ISO 45001:2018 Occupational Health & Safety	DNV Business Assurance	268918-2018-ASA-AUS-JAS-ANZ	30 Jul 2027
In-Water Survey (IWS) — Classification Society Approvals			
In-Water Survey by Diver / ROV	Bureau Veritas	SGP0/CLU/20250805063217	03 Jun 2028
In-Water Survey by Diver / ROV	DNV	AOSS0000K01 Rev. 1	02 Jun 2028
In-Water Survey by Diver / ROV	ClassNK	23TZ499 (Approval No. 08IW024)	03 Sep 2028
In-Water Survey by Diver / ROV	Lloyd's Register	LR23409183AS	08 Dec 2026
In-Water Survey by Diver / ROV	RINA	Initial audit in progress — Offer No. 2025/6811	Pending issue

In-Water Survey by Diver / ROV	ABS	23-5743234-A	14 Mar 2026
Other Accreditations			
Heavy Vehicle Accreditation	Main Roads WA	Operator 14121	27 Nov 2026

Authorisation

Approved by	Prepared by
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