JER-8000-MGT-PRO-0029 Fitness for Work

(AS/NZS, ISO 45001:2018, Clause 8.1.2)

1 INTRODUCTION

The purpose of this procedure is to maintain a safe and healthy work environment for all Workers by minimising, to the extent reasonably practicable, risks associated with Workers being fit and capable to perform their duties safely.

KGL Resources has an overall duty of care to ensure that, as far as is reasonably practicable, before commencing work and at all times during work, all workers are in a good state of physical, psychological and behavioural fitness. Under no circumstances will management allow any worker to work on site if it is reasonable to believe that the worker represents a risk to themselves or others.

2 SCOPE

The procedure applies to all KGL Resources Workers, including contractors and visitors.

3 RELEVANT LEGAL & OTHER REQUIREMENTS

It is the responsibility of all personnel to comply with this procedure and seek guidance from the Project Director where clarification is required.

- Work Health and Safety Act 2011 (NT)
- Work Health and Safety Regulation 2011 (NT)
- Safe Work Australia Model Code of Practice - `How to Manage WHS Risks 2009
- AS/NZS 4308:2023 Procedure of specimen collection and the detection and quantification of drugs in urine
- AS 3547:2019 Breath Alcohol Testing Devices

4 DEFINITIONS

Fitness for Work	Means that an individual is in a state (physical and mental) that enables that individual to perform all assigned tasks competently and in a manner which does not compromise or threaten the safety or health of themselves or others, or threaten damage to plant, equipment or the environment.

5 RESPONSIBILITIES

Senior Leadership Team	1. Provide adequate training, resources and support to ensure the requirements of this procedure can be fulfilled. 2. Review and act on reported fitness for work issues in the workplace.
Safety Manager	1. Ensures this procedure is fit for purpose and meets all applicable legislative requirements. 2. Establishes and maintains fitness for work management and training systems. 3. Provide advice relating to fitness for work. 4. Arrange fitness for work assessments. 5. Assists in determining next steps following fitness for work assessments. 6. Assesses and reports on fitness for work to the Senior Leadership Team. 7. Ensures that this procedure is implemented and is regularly reviewed and monitored for ongoing effectiveness. 8. Supports managers, supervisors and workers in the implementation and operation of this procedure in the business. 9. Recommends change or improvement to this procedure as required.
Managers and Supervisors	1. Monitor workers to ensure fitness for work. 2. Report any concerns regarding fitness for work to the Safety Manager. 3. Ensure workers are aware of and understand this procedure. 4. Ensure workers are provided with appropriate training in relation to fitness for work.
Workers	1. Present for work in a fit manner and can perform their duties safely. 2. Advise their manager or supervisor if they feel they are not in a fit state to perform their duties safely. 3. Advise their manager or supervisor if they are taking any medication that may affect their safe work performance in accordance with KGL Resources' Alcohol and Drug Procedure. 4. Participate in any fitness for work related training, education and awareness sessions.

6 GENERAL REQUIREMENTS

An individual's fitness for work may be impaired by a variety of factors including the adverse effects of medical conditions, level of physical fitness, fatigue, stress, or the use of alcohol and drugs. All workers are required to:

- present for work in a fit manner and can perform their duties safely;
- advise their manager or supervisor if they feel they are not in a fit state to perform their duties safely;
- advise their manager or supervisor if they are taking any medication that may affect their safe work performance in accordance with the KGL Resources' Alcohol and Drug Procedure; and
- participate in any fitness for work related training, education and awareness sessions.

The following procedures also contain requirements that can affect a worker's fitness for work:

- JER-8000-MGT-PRO-0025 Alcohol and Drug Procedure
- JER-8000-MGT-PRO-0028 Fatigue Management Procedure

6.1 Working In the Heat

Sun exposure is now seen as a major hazard for outdoor workers. Prevention is imperative. All managers and supervisors should:

a. Identify work situations where their team, are exposed to the sun;

b. Assess the amount of exposure;

c. Consult with the team; decide on measures to control this hazard;

d. Provide training for workers – inform them of the problems and to teach them prevention.

Protective measures may include:

a. Changing the job, including moving indoors or to another location;

b. Providing shade to avoid direct sunlight;

c. Rotate workers or change work times;

d. Provide Personal Protective Equipment such as sun protective clothing, broad brim hat or helmet broad brim with flap, sunglasses and sunscreen.

If the temperature exceeds 40^0 Celsius all workers must cease and supervisors should seek to reallocate work in a shaded area.

6.2 Fatigue Management

KGL Resources recognises that fatigue can impact on a worker's ability to undertake their work. Fatigue can occur from work and non-work-related actions. Workers who either arrive or become fatigued during their shift must make their Supervisor immediately aware of the situation. The Supervisor will take actions in accordance with the JER-8000-MGT-PRO-0028 Fatigue Management Procedure.

6.3 Drugs & Alcohol

The abuse of drugs and alcohol can become an occupational health and safety issue in the workplace.

KGL Resources are not obligated to inform the authorities of a worker who is onsite and is found to be using illegal substance. Drug or alcohol abuse only becomes a workplace issue where such affected workers present a higher-than-normal risk to other workers or safety and the efficiency of the mining operation.

Drug and alcohol abuse presents a risk for the worker concerned and other workers in the workplace. In the interest of safety for all, no worker will be permitted to enter site while under the influence of alcohol or other drugs which may impair their fitness for work and therefore prejudice safety.

KGL Resources management recognises that alcohol or drug dependency is a treatable illness and encourages workers with these problems to seek appropriate treatment and to avail themselves of their employer's Employee Assistance Programme (EAP).

Where a worker presents themselves for work under the influence of drugs or alcohol, KGL Resource reserves the right to declare them as unfit for work, remove the employee from site and apply the disciplinary process as required and take disciplinary action.

KGL Resource prescribed limit for alcohol is 0.000 grams of alcohol per 100ml of blood.

The initial screening cut-off limit for drugs will be as per AS 4308:2023:

- Amphetamine type substances is 300 Micrograms / litre
- Benzodiazepines is 200 Micrograms / litre
- Cannabis metabolites is 50 Micrograms / litre
- Cocaine metabolites is 100 Micrograms / litre
- Opiates is 300 Micrograms / litre

The site standard for Drug and Alcohol Testing outlines testing procedures and requirements as well as guidelines in protecting individual rights. Refer to:

- JER-8000-MGT-PRO-0025 Alcohol and Drug Procedure:

7 FITNESS FOR WORK ASSESSMENTS

7.1 Pre-Placement

A pre-placement fitness for work assessment is required for all workers, including KGL Resources' staff and contractors, prior to the mobilisation to site. This will be done to assist in the determination of a person's physical and mental fitness for perform the inherent requirements of the role and the work location.

The pre-placement assessment includes:

- Spirometry – lung function
- Audiometry – hearing assessment
- Urine drug and alcohol screening
- Medical history questionnaire
- Physical examination (PEM), including height, weight, blood pressure, and vision screening
- Musculoskeletal and Functional capacity testing, including step testing for fitness, lifting assessments, and other relevant evaluations.

7.2 Worker Presents to Site

A worker may also be required to undergo a medical assessment if a manager, supervisor or other person in the workplace has reasonable grounds to believe that the worker's fitness for work may be affected by physical or mental illness, injury or other condition.

There may be some warning signs, including:

- Lethargy
- Obvious struggle to complete tasks
- Out of character behaviour e.g. irritability / aggression, vagueness
- Apparent lack of attention or concentration
- Smell of alcohol / drugs on an employee
- Obvious illness or injury (e.g. flu symptoms, limping)

If an employee attends work while unwell, generally this is due to being conscientious. The Supervisor needs to make a judgement call as to the correct response in the individual circumstances.

Appropriate actions may include:

- Having the worker take a short break;
- Sending (or driving) the worker home on approved sick leave;
- Driving the worker to a doctor or to the hospital (if not fit to drive themselves); or
- Calling an ambulance if the severity of their condition warrants this action.
- Assigning the worker alternative suitable duties (if available and practicable)

7.3 Other Considerations

Fitness for work considerations shall include both the risks inherent in the work itself, other reasonably foreseeable hazards that may be associated with the worker's role, and any inherent requirements of the role.

Workers who are required to participate in a fitness for work assessment will be provided with an explanation of the reason for the assessment and the process to be undertaken, including:

a. the type and method of any testing required;

b. the test date and time;

c. location of tests; and

d. when and how the test results will be communicated.

7.4 Result Of Fitness for Work Assessment

Where a fitness for work assessment indicates that a worker is unable to perform the inherent requirements of their role or is unable to perform their duties in a safe manner a decision on the next steps will be made in consultation with Human Resources, the relevant managers or supervisor and the worker.

7.5 Return To Work

When an KGL Resources employed worker returns to work after a period of illness or injury a medical assessment may be required to confirm that the worker is fit to perform their duties safely. An injury management and return to work plan/health plan may be required in accordance with the KGL Resource Injury Management and Rehabilitation Procedure. The Safety Manager will oversee the implementation of any return-to-work plan.

7.6 Workers Responsibility

Workers are required to attend work in a good physical and mental condition, so duties are performed in a safe, efficient and productive manner. Workers should be aware that many factors may affect fitness for work, and how these factors interact with each other. These may include:

- General health and fitness
- Secondary employment or volunteer activities
- Recreational activities and sport
- Medications
- Insufficient sleep / fatigue

- Excessive work hours / demands
- Injury or illness (work or non-work related)
- Consumption of alcohol or other drugs
- Personal factors (e.g. psychological, psychiatric issues, family issues or illnesses)
- Mental health concerns
- Personal circumstances

An employee who attends work in an unfit manner is operating outside of this Procedure and may be subject to counselling and / or disciplinary action, depending on the degree of awareness and the severity of the risk to safety.

8 HEALTH MONITORING PROGRAM

KGL Resources recognises that a worker's health may be affected by a range of hazards including:

- *Particulate and gas/vapours*
- *Airborne dust*
- *Noise*
- *Manual handling*
- *Hazardous substances*
- *Radiation*

KGL Resources implements a health monitoring program in the event that a worker may be exposed to a hazard during their normal work, in compliance with Regulation 616, Work Health and Safety (National Uniform Legislation) Regulations 2011. The health monitoring program includes the following:

- *The worker's demographic, medical and occupational history*
- *Physical examination*
- *Audiometric testing if the worker is frequently required to use PPE to protect the worker from the risk of hearing loss associated with noise that exceeds the exposure standard for noise*
- *Any other monitoring that forms part of the control measures to be implemented during the risk assessment and control process (i.e., exposure to crystalline silica or asbestos, exposure to hazardous chemicals).*

Initial health monitoring will be provided within 90 days of the commencement of the worker's employment where health monitoring is required as per the above, and at least every two years thereafter. Health monitoring may also be required prior to the two-year reassessment if:

- *The worker's duties change, and*
- *If assessment of the worker's fitness for work is required.*

Health monitoring for KGL employees will be provided by a competent person at KGL Resources' expense. Health monitoring for contractors will be provided by a competent person at the Contractor's expense. The outcomes of health monitoring may be used to evaluate, review, and modify control measures implemented. Health monitoring reports must be provided to KGL Resources and will be kept by KGL Resources until the worker ceases to be a worker at the site.

Where the results of health monitoring show temporary or permanent changes that may be attributed to exposure to hazards in the workplace, KGL Resources will seek advice from the competent person who completed the assessment regarding workplace changes and accommodations required to better control the hazard.

Health monitoring will be offered to former employees before or when the person ceases to be an employee at the site, if:

- *The person is a worker for whom KGL Resources is required to provide health monitoring; and*
- *More than 12 months has elapsed since the person was last provided with health monitoring.*

A former worker who accepts an offer under Regulation 618 must be provided with Health Monitoring within 30 days of ceasing work at the mine site.

The offer must be accepted by the former worker no later than 7 days after the conclusion of employment.

9 INFORMATION, INSTRUCTION, TRAINING & SUPERVISION

9.1 Communications

Workers shall be kept informed of the fitness for work requirements and of the support services available. These requirements will be communicated where relevant during recruitment processes and workplace communication sessions (e.g. toolbox talks/pre-start briefs).

Ongoing education programs shall be conducted to further raise employee awareness of fitness for work issues including injury, illness, fatigue, stress and the effects of alcohol and other drugs.

9.2 Induction

All workers shall be briefed on fitness for work requirements during the site inductions. The brief shall cover rationale for the fitness for work requirements and the existence of supporting procedures.

9.3 Training

Training should be provided to:

a) managers and supervisors in the identification and management of fitness for work issues and the requirements of this procedure; and

b) workers on the requirements of this procedure.

10 BREACH OF THIS PROCEDURE

Workers must comply with this procedure at all times. KGL Resources takes breaches of this procedure very seriously.

If an employee is found to have breached this procedure, they may be subjected to disciplinary action in accordance with KGL Resources' disciplinary processes. Contractors of KGL Resources who are found to have breached this procedure may be the subject of action under their contract with KGL Resources.

11 RECORD KEEPING

Fitness for Work records shall be maintained in accordance with record keeping requirements in a confidential file relating to the individual worker and with appropriate access restrictions established and in place. Information will only be provided to people who have a legitimate need for it to ensure, safety, health or performance.

12 DISPUTE RESOLUTION

A worker's grievance at a decision relating to fitness for work should be referred to the supervisor in the first instance. Thereafter, parties may seek grievance resolution through KGL Resources' human resources processes.

13 CONSULTATION

This procedure has been developed and implemented in consultation and co-operation with KGL Resources' workers.

14 PRIVACY

KGL Resources will ensure that any information will be handled according to relevant legislation and in accordance with the KGL Resources Privacy Policy.

15 RELATED DOCUMENTATION

JER-8000-MGT-PLN-0010	Risk Management Plan
JER-8000-MGT-PRO-0006	Risk Management
JER-8000-MGT-PRO-0023	Incident Management
JER-8000-MGT-PRO-0025	Alcohol & Drug
JER-8000-MGT-PRO-0028	Fatigue Management
JER-8000-MGT-FRM-0011	Incident Report

16 MONITORING, EVALUATION AND REVIEW

VERIFICATION	
Monitoring	Compliance with this procedure will be monitored through training and regular audits.
Evaluation & Review	The risk rating is low, reviewed every 3 years. A review will be undertaken sooner if there are changes to legislation, standards and industry codes, or following a SMS review, changes as defined by WHS Regulators, or to ensure continual improvement.
Version Control	Version 1: May 2026

17 APPROVAL

Konrad Litfin

Project Director