

WHS Risk Management Procedure

How SteelRiver identifies, assesses, controls and reviews WHS risks

Document number	SRL-CR-030	Version	2.3
Document owner	Priya Sharma, National WHS Manager	Effective date	1 July 2027
Approved by	Rajesh Iyengar, Chief Executive Officer	Next review	July 2028
Applies to	All SteelRiver sites, vehicles and workers	Status	Controlled. Uncontrolled when printed

1. Policy statement

SteelRiver Logistics Pty Ltd (SteelRiver) is committed to identifying, assessing, controlling and reviewing risks to the health and safety of all workers, customers, visitors and other people affected by its operations. This commitment applies at every site, on every vehicle and across every workflow. The Chief Executive Officer and the National WHS Manager are accountable for this procedure nationally. Site managers are accountable for it at their site.

At Perth DC this procedure operates under the Work Health and Safety Act 2020 (WA) and the Work Health and Safety (General) Regulations 2022 (WA). Each other site applies its own state legislation. It gives effect to SteelRiver's duties as a person conducting a business or undertaking (PCBU), the due diligence duties of officers (s.27), the duties of workers (s.28) and the duties of other persons at the workplace (s.29).

2. Scope

This procedure applies to:

- all SteelRiver workers, including employees, contractors, subcontractors, casual workers, labour hire workers and visitors
- all SteelRiver sites and vehicles, and customer sites where SteelRiver workers are present
- all work activities, including warehouse operations, line haul, customer delivery, and office and administrative work
- every stage of risk management, from hazard identification to evaluation and continuous improvement.

3. Risk appetite

SteelRiver's WHS risk appetite is conservative. The board has set a target of zero workplace fatalities, fewer than 2.0 lost time injuries per million hours worked, and a falling total recordable injury frequency rate year on year.

Risk rating	Before work can proceed	Monitoring
Extreme	Eliminate the risk or reduce it to High or below	Daily until reduced
High	Formal control plan approved by the DC Manager	Weekly during implementation

Risk rating	Before work can proceed	Monitoring
Medium	Documented controls	Monthly
Low	Documented controls	Periodic review

4. Roles and responsibilities

Role	Responsibilities
Officers (s.27): CEO, CFO, Operations Director, National WHS Manager, Head of People and Culture	Exercise due diligence to ensure SteelRiver complies with its WHS duties. Acquire and keep up to date knowledge of WHS matters. Provide and review resources and processes. Receive and respond to information about WHS risks.
Distribution Centre Managers (workers, s.28)	Day to day accountability for WHS risk management at the site. Authorise risk assessments and sign off control plans. Allocate site WHS resources. Lead the site consultation arrangements.
WHS Coordinators (workers, s.28)	Maintain the site risk register. Facilitate hazard identification. Coordinate consultation. Keep WHS records in the WHSIS. Support the DC Manager on WHS reporting.
Shift Supervisors (workers, s.28)	Identify hazards during normal work. Implement and supervise controls. Report hazards in MyOSH. Run pre-start toolbox talks and brief workers on changes to controls.
Health and Safety Representatives (workers, s.28, with HSR powers)	Represent their work group. Take part in consultation. Inspect the workplace. Investigate complaints. Refer unresolved matters to WorkSafe WA. Direct unsafe work to cease where reasonable.
All workers (s.28)	Take reasonable care for their own and others' health and safety. Follow reasonable WHS instructions and training. Report hazards.

5. Risk management process

SteelRiver follows a five-step process aligned to AS ISO 31000:2018 Risk management and the WorkSafe WA Code of Practice: How to manage work health and safety risks.

Forms and records used in this process

- SRL-CR-060 Hazard Identification Form
- SRL-CR-061 Risk Assessment Template and SRL 5x5 Risk Matrix
- SteelRiver Risk Register, held in the WHSIS (MyOSH)

Step 1 Identify hazards

- Walk through the workplace at least monthly, and more often during change.
- Ask workers, supervisors and HSRs about emerging hazards.
- Review incident, near miss and hazard reports in MyOSH.
- Review external sources: WorkSafe WA alerts, industry bulletins, supplier information and customer feedback.
- Record each hazard on SRL-CR-060 Hazard Identification Form.

Step 2 Assess risks

- Rate each hazard with the SRL 5x5 risk matrix (likelihood by consequence) on SRL-CR-061.

- Consider the work groups exposed, the nature of the work and the controls already in place.
- Record the rating as Low, Medium, High or Extreme.

Step 3 Control risks

- Apply the hierarchy of control: elimination, substitution, isolation and engineering, administrative controls, then personal protective equipment.
- Select controls that suit the level of risk, SteelRiver procedures and WHS laws.
- Plan implementation through the WHSMS and track every action in the WHSIS.
- Assign each control a responsible person and a completion date.
- Communicate controls to everyone affected through toolbox talks, training updates and SOP revisions.

Step 4 Review controls

- Set lead and lag KPIs for the risk management process.
- Monitor how well controls work against those KPIs at agreed intervals.
- Investigate incidents and near misses that occur after controls are in place.
- Change controls in response to the findings, and consult on the changes.

Step 5 Keep records and communicate

- Maintain the Risk Register in the WHSIS, synchronised daily to the national system.
- Report findings through toolbox talks, briefings, written reports and the monthly site WHS report.

6. Consultation

SteelRiver meets its duty to consult under section 47 of the WHS Act 2020 (WA) through the arrangements in SRL-CR-031 WHS Consultation and Participation Procedure, including:

- elected HSRs for each work group
- the Perth DC WHS Committee, meeting monthly
- pre-start toolbox talks on every shift
- paired site walks with an HSR on a rotating schedule
- a WHS suggestions inbox checked weekly by the WHS Coordinator.

Document history

Version	Date	Summary of change	Approved by
2.3	1 July 2027	Merged into the national document set as SRL-CR-030. Updated document owner and references.	Rajesh Iyengar
2.2	1 July 2026	Annual review. Risk appetite thresholds confirmed.	Rajesh Iyengar