

# JUST CULTURE POLICY



Workplace incidents are not solely the result of an individual's reckless or unsafe behaviour; but instead are often the result of a combination of contributing factors. These factors can include; human interaction with systems, failure to adhere to Policy, or failure to correctly follow relevant processes/procedures.

The application of a 'Just Culture' Policy is designed to address human behaviours and to ensure that there is clear accountability for decisions and actions taken.

Bhagwan Marine is committed in maintaining a positive safety culture and the protection of our people, assets and reputation. These commitments are in line with our core values designed in establishing and sustaining trust. Employees are encouraged to contribute in maintaining a safe workplace through the reporting and management of hazards; reporting near miss events and incidents. It is equally important that all employees take responsibility for their own actions and behaviours, and that there is a clear understanding and trust when identifying what is acceptable behaviour and what is not acceptable behaviour.

As part of the normal investigative process for any notable health and safety event, the line manager will conduct an investigation to determine the "human factors" that led or has potential to lead to an unwanted event. The 'Just Culture' Policy and the supporting procedures and protocols when applied, shall help clearly distinguish between:

- ✓ Reckless behaviour;
- ✓ Negligent behaviour;
- ✓ Wilful violation;
- ✓ Blameless acts.

The event will be assessed objectively by management and then analysed using a systematic approach based on the above classifications of behaviour.

Exceptions to this process will include an individual who knowingly or willingly conceals an incident or event and subsequently hinders the safety investigation, or an individual that causes an event or commits an unsafe act through his/her actions as follows:

- Any illegal act;
- An intentional breach of established policy or procedure;
- A purposeful or reckless unsafe act;
- An act committed under the influence of alcohol or other substances; and
- A recurring issue that has not been resolved through performance review and management.

All managers and employees in leadership positions shall apply the 'Just Culture' Policy as part of our overall 'continual improvement' program.

**Loui Kannikoski**  
Managing Director