



Rethinking safety through
INCLUSION
+
WELLBEING

ENVIRONMENT

SYSTEM REQUIREMENT

28/01/2025

COMPLIANCE OBLIGATIONS

PURPOSE AND SCOPE

This System Requirement outlines the process for determining the organisational compliance obligations relevant to Laing O'Rourke's operations and how they apply to environmental performance and system improvements.

1.0 COMPLIANCE OBLIGATIONS

Compliance obligations (see **Figure 1**) consist of mandatory and voluntary requirements related to Laing O'Rourke's environmental aspects and impacts. Laing O'Rourke must determine risks and opportunities associated with compliance obligations.

Mandatory compliance obligations are those related to legislative instruments that apply to our projects and operational facilities. These generally include the following:

- Environmental legislation matters from government authorities including matters such as air, land and water pollution that result from environmental aspects and impacts
- Environmental licence and permit requirements and other authorisations
- Project and operational facility conditions of approval as a result of development consent requirements, commitments and obligations
- Contractual requirements.

Voluntary compliance obligations are other requirements that result from Laing O'Rourke's commitments to industry policy, best practice guidelines and codes of practice.



Figure 1 Environmental compliance obligations



2.0 IMPLEMENTATION OF COMPLIANCE OBLIGATIONS

An assessment of the relevant compliance obligations is conducted for each project and operational facility. The assessment is documented in the relevant Environmental Management Plan (EMP). These compliance obligations are to be identified in the context of the Laing O'Rourke Environmental Aspects and Impacts Register, which forms part of the Environmental Management System (EMS). Licences, permits and approvals applicable to the project or workplace are to be determined and documented in the EMP.

Laing O'Rourke subscribes to Environment Essentials to monitor and provide a comprehensive update and change notification service of all Australian legislation changes and likely impacts to Laing O'Rourke HSE Managers.

The Environment and Sustainability (ES) General Manager or their delegates will review the updates against the current Laing O'Rourke EMS and advise recommendations or actions such as changes to rules, processes, guidelines or plans. This process is outlined in **Table 1**.

Table 1 Legislation update process

STEP 1	STEP 2	STEP 3	STEP 4	STEP 5
Change in legislation, best practice, standard, code: - Environment Essentials notification - Lawlex or other subscription - Industry briefing - Other source.	Environmental technical review: - Matter reviewed and considered by HSE Leader or environmental resource - Minor matters be included in revisions to the relevant State EMP template.	Hub level environmental review: - Impacts assessed and actions assigned - Legislation changes included in Hub Board Report.	Briefing note/paper of recommendations to ES General Manager as required: - Required for major changes only - Business impacts/risk assessment - Recommendations on changes to EMS - ES General Manager to advise Hub Board.	Implementation of agreed actions: - EMS update - EMP template update - Toolbox/business notification - Precontracts - Commercial - Procurement - People.

Non-legislative compliance obligations will be identified through engagement with external stakeholders, knowledge sharing and best-practice forums. These obligations will generally support the development and improvement of operational controls and the Laing O'Rourke environmental assurance framework. All Laing O'Rourke personnel will comply with relevant legal requirements.

Maintaining organisational awareness of compliance obligations will be achieved through Laing O'Rourke's environmental induction, training and communications programmes.

3.0 EVALUATION OF COMPLIANCE

Processes and procedures for the evaluation and determination of compliance status is documented in **System Requirement Compliance Review and Assurance**. This includes the following:

- Environmental inspection reports and environmental monitoring
- Compliance tracking matrix and reports
- Environmental audit reports
- Digital contract reviews
- Internal Board reports.

Project or operational facility compliance procedures and status will be documented in the relevant EMP. Project- or facility-specific procedures will address contract specific requirements and other bespoke compliance obligations. The environmental management review process will consider the effectiveness of the compliance process and assurance plan.

4.0 PLANS, FORMS AND TEMPLATES

For relevant plans, forms and templates see the Laing O'Rourke HSEMS at www.lorhsems.com.