

 Manual		CGS Management System Manual
Issue: U	ID: QM01	

Revision History

Date	Issue	Description	Record of Review	Process Authority	Process Owner
17/09/2021	R	Approved and signed PDF	Element Owners, Operations Senior Leaders reviewed	Darren Davis Charlie Litchfield Rob Cavallaro	Roger Whitby
23/09/2021	S	Approved and signed PDF	Element Owners, Operations Senior Leaders reviewed	Darren Davis Charlie Litchfield Rob Cavallaro	Roger Whitby
11/11/2022	T	Approved and signed PDF	Element Owners, Operations Senior Leaders reviewed	Darren Davis Charlie Litchfield Rob Cavallaro	Roger Whitby
07/02/2024	U	Approved and signed PDF	Element Owners, Operations Senior Leaders reviewed	Darren Davis Charlie Litchfield Rob Cavallaro	Roger Whitby
23/01/2025	V	Approved and signed PDF	Element Owners, Operations Senior Leaders reviewed	Michelle Corby Charlie Litchfield Rob Cavallaro	Roger Whitby

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Foreword

Snowy Hydro Limited (**Snowy Hydro**) was incorporated on 27 June 2002 and is owned by the Commonwealth Government of Australia.

Snowy Hydro is the parent company of Red Energy and Lumo Energy, electricity retailers selling electricity and gas to consumers in the NSW, Victorian and South Australian markets. We operate under the Corporations Act 2001 and are subject to national competition laws and electricity codes and relevant safety and environmental legislation in New South Wales (**NSW**), Victoria (**Vic**), South Australia (**SA**) and Commonwealth.

The prime business activities of Snowy Hydro involve:

- Generation of electricity, wholesale supply, trading and retail supply;
- Storage and release of water for irrigation; and
- Provision of energy and water risk products.

Snowy Hydro has a “Clean, Green and Safe” philosophy, which drives the business to:

- Maintain a healthy and safe workplace to prevent injury and illness and to support employee wellbeing
- Meet customer requirements and statutory obligations for all products and services
- Manage the environment responsibly and meet all related statutory obligations
- Sustain continual improvement and achieve best practice in core activities
- Optimise asset management to ensure reliable performance and the elimination of environmental and safety risks

We are committed to providing a safe workplace for our employees, caring for the environment in which we operate, working to continually improve our processes and meeting customer requirements and statutory obligations.

To meet this commitment we have developed and implemented the Clean Green and Safe Management System (**CGS**) for the Generation business.

Integrated CGS Management System

Our integrated management system incorporates Health, Safety, Environment and Quality (HSEQ) and Asset Management (AM) frameworks to meet business requirements. The system is referred to within Snowy Hydro as the CGS Management System and conforms to:

- ISO 9001 Quality Management Systems
- ISO 14001 Environmental Management Systems
- ISO 45001 Occupational Health & Safety Management System
- ISO 55001 Asset Management Systems

Snowy Hydro currently maintains certification of its CGS Management System to the ISO standards for Safety, Environment and Quality.

The CGS Management System centres on 4 focus areas which are separated into 20 Elements. Each of the 20 Elements has an objective and a number of minimum requirements that are to be implemented and managed to achieve the objective.

Focus Area 1: Leadership & Workforce Capability

These five elements establish how we define, communicate, and manage resources for effective performance.

- 1. Leadership, commitment and responsibility.**
- 2. Identification and compliance with legislation, obligations and industry standards.**
- 3. Employee selection, placement and competency, and health assurance.**
- 4. Workforce involvement.**
- 5. Communication with stakeholders.**

Focus Area 2: Identification & Assessment of Hazards, Risks and Opportunities

These two elements establish the requirements in how we identify and assess the hazards, risks and opportunities to assure the integrity of operations, as well as recording and maintaining the knowledge developed from these risk identification and assessment activities.

- 6. Hazard identification and assessment of risks and opportunities**
- 7. Documentation, records and knowledge management**

Focus Area 3: Management Of Risks, Opportunities & Obligations

These eleven elements establish requirements to ensure the integrity of control measures that have been identified during identification and assessment activities are implemented and managed appropriately.

- 8. Operating manuals**
- 9. Operational status monitoring and handover**
- 10. Management of operational interfaces**
- 11. Standards, practices and procedures**
- 12. Management of change and project management**
- 13. Operational readiness and plant start up**

- 14. Emergency preparedness**
- 15. Inspection and maintenance**
- 16. Management of critical equipment**
- 17. Work control, permit to work and task risk management**
- 18. Contractor and supplier, selection and management**

Focus Area 4: Review and Continual Improvement

The two elements establish requirements in how we measure and review conformance with each of the element objectives and requirements and ensure we learn from measurements, insights and investigation findings.

- 19. Event reporting and investigation**
- 20. Audit, assurance, management review and intervention**

Focus Area 1: Leadership & Workforce Capability

Element 1: Leadership, Commitment and Responsibility

Assurance of the integrity of an organisation's operations requires visible leadership commitment and accountability at all levels of the organisation.

Management must establish relevant policies, provide perspective, set performance targets and provide the structure and resources to achieve, maintain and continually improve the CGS management system and HSEQ and AM performance.

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| <p>1.1. The documented policies are in place and approved by the Board. They are regularly reviewed and updated to reflect the needs of the organisation.</p> | <p>1.6. Clear objectives, performance targets and action plans are established and performance is regularly evaluated against these.</p> |
| <p>1.2. Governance and support arrangements are defined and implemented at all levels from the Board through to the workforce.</p> | <p>1.7. Required leadership attributes are defined, developed and integrated into the required competencies for leaders.</p> |
| <p>1.3. A Management System, with a defined scope, is in place which meets applicable legislation and other requirements and manages risks and opportunities that may arise as a result of the Generation operations.</p> | <p>1.8. Executives and managers visibly demonstrate personal commitment and accountability to the CGS management system, leading by example and upholding core values and standards of the organisation.</p> |
| <p>1.4. Roles, responsibilities, authorities and accountabilities for the management of the system are known and exercised.</p> | <p>1.9. Executive and managers promote an open and trusting environment and understand how their behaviours impact others.</p> |
| <p>1.5. Sufficient competent resources are in place to cover the defined roles and responsibilities for the implementation, maintenance and continual improvement of the CGS management system.</p> | <p>1.10. Executive and managers maintain an understanding of what is happening in the workplace in order to identify and address key issues and improvement opportunities.</p> |
| | <p>1.11. Executive and managers recognise and reward positive behaviours and performance and intervene to correct deviations from required performance at all levels in the organisation.</p> |

CGS Management System		ISO Mapping			
Focus Area	Element	Quality	Safety	Environment	Asset Management
FOCUS AREA 1 - LEADERSHIP	1	4.4 Management system and its processes	4.4 OH&S management system	4.4 Environmental management system	
		5.1 Leadership and commitment			
		5.2 Policy			
		5.3 Organisational roles, responsibilities and authorities			
		6.2 Objectives and planning to achieve them			
		7.1 Resources			

Relevant CGS Documents	
POL-002 Snowy Hydro Group Health & Safety Policy	POL-107 Asset Management Policy
POL-400 Environment Policy	POL-080 Risk Management Policy
POL-050 Quality Policy	QP22-66 Just Culture Procedure
Corporate Plan FY 2022-2026	
Appendix A: Element Owner Requirements, Accountabilities and Responsibilities	
Appendix B: Mapping of ISO Standards to CGS Elements and Expectations	

Element 2: Identification and compliance with legislation, obligations and industry standards

Management must ensure that the requirements of applicable legislation, compliance or regulations are identified, understood and complied with.

Snowy Hydro regularly identifies, evaluates and reviews safety, environmental and quality regulatory requirements applicable to the Generation business. These requirements include Commonwealth, State and local government legislation, planning policies and binding agreements to which Snowy Hydro is a party.

Snowy Hydro takes these requirements into account when setting safety, environment and quality objectives and when planning works with potential environmental and safety impacts or hazards.

These requirements together with their application to Snowy Hydro activities are described in the Compliance Registers, and are incorporated into a range of CGS procedures and supporting documents and tools. Specific legal compliance training is provided to staff as required.

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| <p>2.1. Requirements of applicable legislation, regulations, licences, permits, prescribed codes and standards and practices and other governmental requirements are identified, documented and kept current.</p> | <p>2.3. Compliance with legislation and industry standards is systematically verified.</p> |
| <p>2.2. The operating requirements arising from the legislation and prescribed industry standards are defined, documented and communicated to those affected.</p> | |

CGS Management System		ISO Mapping			
Focus Area	Element	Quality	Safety	Environment	Asset Management
FOCUS AREA 1 - LEADERSHIP	2	4.1 Understanding the organisation and its context			
		4.3 Determining the scope of the management system			
		6.1 Actions to address risks and opportunities			
			6.1.3 Legal & other requirements		
			6.1.4 Planning action		
			9.1.2 Evaluation of compliance		

Relevant CGS Documents	
POL-083 Compliance Policy	QP25-10 Environmental Compliance
Legal Compliance Registers retained in ENABLON	

Element 3: Employee selection, placement and competency, and health assurance

Control of operations depends upon having competent people in position. Management must ensure that all workers have the required competencies to conduct their activities in a safe, effective, efficient and environmentally responsible manner.

All personnel appointed to positions within Snowy Hydro must have appropriate trade or professional qualifications, and/or the relevant skills and experience, and behavioural values consistent with the assigned level of personal accountability associated with the position.

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| <p>3.1. Employee competency and fitness for work are regularly assessed against requirements defined for their assigned role and responsibility.</p> <p>3.2. A documented process is in place for screening, selection and placement of employees which confirms their suitability for the specified requirements for the role.</p> <p>3.3. Individual and collective experience and knowledge are maintained and are considered when personnel changes are made affecting critical roles and documented in accordance with management of change.</p> | <p>3.4. Roles and responsibilities are designed to take account of human capabilities and limitations and other key human and organisational factors.</p> <p>3.5. Appropriate induction and handover is carried out for personnel taking up new or revised critical positions.</p> <p>3.6. A staff development and succession plan is in place for all required critical positions.</p> <p>3.7. Employee training and development needs are identified through systematic processes and reviewed to assess effectiveness.</p> <p>3.8. Each person understands, accepts and is competent to deliver against responsibilities for critical roles.</p> |
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CGS Management System		ISO Mapping			
Focus Area	Element	Quality	Safety	Environment	Asset Management
FOCUS AREA 1 - LEADERSHIP	3	7.1 Resources			
		7.2 Competence			
		7.3 Awareness			

Relevant CGS Documents	
QP24-87 Health & Safety Training	QP24-82 Fitness for work procedure
QP09-76 Recruitment and selection procedure	QP18-01 Training and development procedure
QP24-09 Injury and Rehabilitation management procedure	Competent worker standard (in development)

Element 4: Workforce involvement

Management must align, involve and empower the workforce in the identification of hazards, assessment of risks and opportunities and encourage participation to determine risk controls, and corrective actions stemming from incidents and nonconformities.

- 4.1. Workers are actively engaged in the improvement of business performance and have an understanding of hazards, their identification and management / control.

4.2. Leaders engage workers in two-way communication regarding CGS policies, objectives, performance targets, action plans and sharing lessons learned from inside and outside Snowy Hydro.

4.3. Communication and engagement mechanisms, in consultation with workers, are established and maintained for workforce involvement and issue resolution.

CGS Management System		ISO Mapping			
Focus Area	Element	Quality	Safety	Environment	Asset Management
FOCUS AREA 1 - LEADERSHIP	4		5.4 Consultation and participation of workers		
			7.3 Awareness		

Relevant CGS Documents	
QP24-83 Workplace health & safety consultation & issue resolution	SP24-16 Contractor environment and safety management
QP14-01 Action management	QP25-16 Operational Risk Management and Control of Work

Element 5: Communication with stakeholders

Snowy Hydro needs to be able to manage the risks and opportunities that have potential to affect its stakeholders. To do this, management must identify key stakeholder groups and develop and maintain a good working relationship with them, understanding and addressing their issues and concerns.

Given the nature of Snowy Hydro's business, customer and stakeholder satisfaction and perceptions of the organisation are of paramount importance. Customer satisfaction is reflected and monitored in the working relationships and communication between Snowy Hydro and our adjacent neighbours, local communities, EPA, Comcare, NSWSP, AEMO and other regulators. See **Appendix C** for a full listing of Key Interested Parties.

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| <p>5.1. A defined stakeholder engagement system supports Snowy Hydro to identify, develop and maintain a good working relationship with the statutory and non-statutory stakeholders about its activities, including emergency response communications.</p> <p>5.2. Snowy Hydro can demonstrate that the consultation process with statutory and non-statutory stakeholders is appropriate and proportionate and follows a defined process.</p> | <p>5.3. Appropriate information is published in the public domain to demonstrate Snowy Hydro's commitment to continually improving its performance.</p> <p>5.4. Effectiveness of programs for communication with stakeholders is regularly reviewed by specified levels of management.</p> |
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CGS Management System		ISO Mapping			
Focus Area	Element	Quality	Safety	Environment	Asset Management
FOCUS AREA 1 - LEADERSHIP	5	4.2 Understanding the needs and expectations of interested parties			
		5.1.2 Customer focus			
		7.4 Communication			
		8.2 Customer satisfaction			

Relevant CGS Documents	
QP15-01 Handling, storage, packaging, preservation & delivery of product	Disclosure Guidelines for External Communication
POL-352 Sponsorship	Network Connection Agreements and other compliance documents
Environment Stakeholder Engagement Register	Corporate Stakeholder Engagement Register

Appendix C: Key Interested Parties
Focus Area 2: Identification & Assessment of Risks & Opportunities
Element 6: Hazard identification and assessment of risks and opportunities

Management must ensure that a risk assessment process systematically identifies, assesses and appropriately manages the risks, obligations and opportunities arising from Snowy Hydro's operations. Criteria has been set for risk acceptance and escalation for specific risks in Snowy Hydro business processes.

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| <p>6.1. A structured process is applied to identify hazards and ensure that the risks and opportunities arising from the organisation's assets and operations are systematically assessed.</p> <p>6.2. Risk control measures are identified and implemented, using the hierarchy of control, to manage the identified risks to a level that is as low as reasonably practicable (ALARP).</p> <p>6.3. Assigning the level of risk and the criteria for escalation is consistently understood and applied throughout Snowy Hydro (e.g. health and safety, environmental impact and financial loss).</p> <p>6.4. Risk assessments consider all relevant areas - Including environmental aspects, human and organisational factors.</p> <p>6.5. Risk assessments are carried out by competent personnel with appropriate independence.</p> | <p>6.6. Completed risk and opportunity assessments are reviewed, approved and accepted by specific levels of management appropriate to the magnitude of the risk and any decisions are clearly documented.</p> <p>6.7. The status of risk control measures is reviewed at regular intervals by specified levels of management to ensure risk assessment recommendations are resolved in a timely manner.</p> <p>6.8. Stakeholders are kept informed about the risk and opportunity assessment process and results.</p> <p>6.9. The implementation of mitigation recommendations for the top risks, obligations and opportunities are reviewed regularly by specified levels of management.</p> <p>6.10. Risk assessments take into account lessons from incidents from both inside and outside the organisation.</p> |
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CGS Management System		ISO Mapping			
Focus Area	Element	Quality	Safety	Environment	Asset Management
FOCUS AREA 2- RISK IDENTIFICATION AND ASSESSMENT	6	6.1 Actions to address risks and opportunities			
			8.2 Emergency preparedness and response		
			10.2 Incident, nonconformity and corrective		

			action and response		
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Relevant CGS Documents	
POL-080 Risk management policy	Risk Management Strategy
PRO 19-01 Risk Management	G19-01-A Corporate risk rating criteria
QP25-16 Operational risk management and Control of Work procedure	QP25-01 Identification of environmental aspects & significant impacts
QP19-04 Major Accident Event Risk management	

Element 7: Documentation, records and knowledge management

Management must ensure that the information required to support safe operation is identified, available and up to date.

Documented information is developed and controlled to:

- Ensure that Snowy Hydro's mission is understood at all levels of the organisation and provide confirmation that they have been satisfied
- Ensure that risks and opportunities are addressed appropriately and in a timely manner.
- Provide a systematic approach for continual improvement in health, safety, environment and quality performance.
- Ensure Snowy Hydro operational processes are undertaken in a controlled manner.

7.1 There are procedures to define, develop and maintain the required documentation and records necessary to support robust operation and maintenance of assets.

>7.3 Documentation and records are version controlled, regularly reviewed and kept up to date.

>7.4 Documentation and records including those kept electronically are appropriately safeguarded

>7.2 Documentation and records are readily available to those who need to use them.

>7.5 Information is documented and retained according to the retention requirements.

CGS Management System		ISO Mapping			
Focus Area	Element	Quality	Safety	Environment	Asset Management
FOCUS AREA 2- RISK IDENTIFICATION AND ASSESSMENT	7	7.5 Documented information			7.5 Information requirements
Performance Standard		ELEMENT 7 CGS PERFORMANCE STANDARD			

Relevant CGS Documents	
QP05-03 Management of Controlled Process Documents	QP05-06 Information Asset Management
QP09-20 Collection and Management of Hydrometric Data	

Focus Area 3: Management Of Key Risks, Opportunities & Obligations

Element 8: Operating manuals

Operation of facilities within established parameters and according to legislation is an essential aspect of business management. Management must ensure that the operating manuals and procedures required to support operations are identified, available, accurate, up to date, understood and used.

- >8.1 Operating manuals and procedures are proportionate with the operational risk, and include environmental and human factors considerations.
- >8.2 Operating procedures are designed to maximise usability and minimise the likelihood of error and non-conformance.
- >8.3 Operating manuals and procedures should provide where relevant:
 - A clear safe operating envelope (SOE).
 - The steps required to prevent an excursion outside the SOE.
 - Clear instructions on actions to be taken if an excursion outside the SOE occurs.

CGS Management System		ISO Mapping			
Focus Area	Element	Quality	Safety	Environment	Asset Management
			5.4 Consultation and participation of workers		
FOCUS AREA 3 - Operating Manuals and Procedures	8		6.1.4 Planning action		
			7.5 Documented information		
Performance Standard		ELEMENT 8 CGS PERFORMANCE STANDARD			

Relevant CGS Documents	
Operating Instructions	OI's

Element 9: Operational status monitoring and handover

Comprehensive operational status monitoring and effective handover between work groups is essential to assure the continued integrity of Snowy Hydro's operations.

Management must ensure the operational status monitoring, and handover requirements are defined, understood and carried out.

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| <p>>9.1 Operational limits (integrity envelopes) are defined for all assets, proportionate with risk and are reviewed and kept up to date.</p> <p>>9.2 Operating parameters are monitored against integrity envelopes.</p> <p>>9.3 Excursions beyond integrity envelopes are identified and followed up.</p> | <p>>9.4 Arrangement for integrity limits and their significance are understood and monitoring requirements are followed; understanding of arrangements and compliance with them is regularly tested.</p> <p>>9.5 Handover arrangements are defined, understood and implemented proportionate with risk, covering handovers such as:</p> <ul style="list-style-type: none"> • Operational and maintenance shift handover. • Successive work groups. |
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CGS Management System		ISO Mapping			
Focus Area	Element	Quality	Safety	Environment	Asset Management
FOCUS AREA 3 - RISK MANAGEMENT	9	7.4 COMMUNICATION			
		9.1 MONITORING, MEASUREMENT, ANALYSIS AND EVALUATION			
			7.5 DOCUMENTED INFORMATION		
Performance Standard		ELEMENT 9 CGS PERFORMANCE STANDARD			

Relevant CGS Documents	
Alarm Management	SP12-25
Alarm Philosophy	QP09-94
Alarm Prioritisation	SP09-95

Element 10: Management of operational interfaces

Management must ensure that operational interfaces with third parties are identified, assessed and appropriately managed. For example generation and water connections and licenses, trading, local government, EPA and NPWS who provide or receive service, utilities, or products that may impact the organisation's operations.

>10.1 Management must ensure that operational interfaces with third parties are identified, documented, assessed and appropriately managed.

>10.2 Management requirements are implemented so as to be proportionate to the risks associated with failure of the operational interface.

CGS Management System		ISO Mapping			
Focus Area	Element	Quality	Safety	Environment	Asset Management
FOCUS AREA 3 - RISK MANAGEMENT	10	4.1 UNDERSTANDING THE ORGANISATION AND ITS CONTEXT			
		4.2 UNDERSTANDING THE NEEDS AND EXPECTATIONS OF INTERESTED PARTIES			
Performance Standard		ELEMENT 10 CGS PERFORMANCE STANDARD			

Relevant CGS Documents

[Control of Work - Grid page](#)

Element 11: Standards, Procedures and practices

Snowy Hydro's performance is enhanced by using robust standards, procedures and safe working practices.

Management must ensure that the required standards, procedures and safe working practices, to support project maintenance and operational activities, are identified, developed and consistently applied.

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| <p>>11.1 Design, construction, operation, inspection and maintenance standards are defined that address legislative requirements, industry standards and the organisation's good practices into a clear set of requirements to be used when developing project, inspection and maintenance plans.</p> | <p>>11.5 Authority to approve standards, procedures and practices are assigned to specific competent individuals.</p> |
| <p>>11.2 Safe working practices are defined, which address legislative requirements, industry standards and the organisation's good practices into a clear set of procedures.</p> | <p>>11.6 Deviation from design standards, maintenance requirements, procedures and safe work practices are permitted only after assessment, review and approval by specific competent individuals and after the rationale for the decision is documented.</p> |
| <p>>11.3 Approved standards, procedures and practices are reviewed and kept up to date, to take into account changes to legislation, industry standards, and industry and the organisation's good practices and findings from incidents.</p> | <p>>11.7 Procedures are in place to routinely monitor to ensure that facilities and materials received meet design standards and that construction is in accordance with applicable design standards.</p> |
| <p>>11.4 Approved standards, procedures and practices are readily available to those who need them, including contractors.</p> | <p>>11.8 When a new updated standard, procedure or practice is issued, the requirements for retrospective application are defined and approved by specific competent individuals after the rationale for the decision is documented.</p> |

CGS Management System		ISO Mapping			
Focus Area	Element	Quality	Safety	Environment	Asset Management
FOCUS AREA 3 - RISK MANAGEMENT	11	7.5 Documented information			
			6.1.3 Legal & other requirements	6.1.3 Compliance obligations	
			8.1 Operational planning & control		
Performance Standard		ELEMENT 11 CGS PERFORMANCE STANDARD			

Relevant CGS Documents	
Design Control - QP04-01	Environmental Standards Handbook
Asset Management - POL-107	Snowy Lifesaving Rules
Operating Instructions - OI's	Legal Compliance Registers retained in ENABLON

Element 12: Management of change and project management

The introduction of any form of change into an organisation, if not appropriately managed, can significantly increase the levels for risk.

Management must ensure that risks arising from any form of change are systematically identified, assessed and managed.

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| <p>>12.1 A process is in place which systematically identifies, assesses and manages the risk arising from both temporary and permanent changes.</p> | <p>>12.7 Key stages in the project development lifecycle are reviewed and approved by specified level of management with due consideration of operational requirements.</p> |
| <p>>12.2 Management of change considers environmental, human and organisational factors.</p> | <p>>12.8 Criteria are established and procedures are in place for conducting and documenting risk assessments at specific project stages to confirm the integrity of new assets and existing assets planned to be modified.</p> |
| <p>>12.3 Changes are approved by specified competent individuals proportionate with the risk associated with the proposed change.</p> | <p>>12.9 Impacts of new business developments on operational interfaces and the local community are assessed and communicated to relevant authorities and integrated into the business case.</p> |
| <p>>12.4 Pertinent records covering all changes are maintained, and all relevant records and documentation are identified and updated with the required changes.</p> | |
| <p>>12.5 Temporary changes do not exceed initial authorisation for scope or time without review and approval.</p> | <p>>12.10 Procedures are in place to identify and manage the risk arising from the mothballing and decommissioning or disposal of assets including dismantling, demolition and site remediation.</p> |
| <p>>12.6 Project management procedures are documented, well understood, readily available to those who need to use them (including contractors) and executed by competent personnel.</p> | |

CGS Management System		ISO Mapping			
Focus Area	Element	Quality	Safety	Environment	Asset Management
			4.2 Understanding the needs and expectations of workers and other interested parties	6.2 Environmental objectives and planning to achieve them	
FOCUS AREA 3 - RISK MANAGEMENT	12	6.3 PLANNING OF CHANGES	8.1.3 MANAGEMENT OF CHANGE		8.2 MANAGEMENT OF CHANGE
		8.1 OPERATIONAL PLANNING AND CONTROL			
		8.3 DESIGN AND DEVELOPMENT OF PRODUCTS AND SERVICES	6.1 Actions to address risks and opportunities		
		ELEMENT 12 CGS PERFORMANCE STANDARD			
Performance Standard					

Relevant CGS documents	
Change Management Manual	QM-32
Change Management Procedure	QM32-01
Plant Change Control	QP09-78

Element 13: Operational readiness and process start up

The commissioning and start-up of new, modified or existing plant and equipment is a high risk operation.

Management must ensure that there is a systematic process to verify that plant and equipment is in a safe condition, and that personnel are appropriately prepared, before start-up or return to normal operation. This requirement covers system checks conducted as part of readiness for start-up assurance activities for project start-up, restart after major shutdown and start-up following a trip.

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| <p>>13.1 There is a systematic process for checking operational readiness and the integrity of systems before they are brought into or returned to service.</p> | <p>>13.4 There are defined criteria for categorising and handling identified issues and outstanding work items.</p> |
| <p>>13.2 There are defined criteria for operational readiness reviews and they are regularly reviewed and updated.</p> | <p>>13.5 Completed system checks are reviewed, approved and accepted by specific levels of management appropriate to the magnitude of the risk.</p> |
| <p>>13.3 System checks are carried out and documented by competent personnel.</p> | <p>>13.6 Commissioning and start-up procedures have defined stages, hold/check points, progression criteria and review authorities.</p> |

CGS Management System		ISO Mapping			
Focus Area	Element	Quality	Safety	Environment	Asset Management
FOCUS AREA 3 - RISK MANAGEMENT	13		6.2 OHS objectives and the planning to achieve them	6.2 Environmental objectives and the planning to achieve them	
Performance Standard		ELEMENT 13 CGS PERFORMANCE STANDARD			

Relevant CGS documents	
Operational Readiness - Testing & Commissioning	QP09-101

Element 14: Emergency Preparedness

Management must ensure that in the event of an incident, Snowy Hydro is appropriately prepared for all necessary actions which may be required for the protection of: personnel; the environment; assets (including equipment); Snowy Hydro's reputation and livelihood.

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| <p>14.1. A process is in place to identify emergency and crisis events and to develop adequate mitigative controls.</p> <p>14.2. Effective emergency plans, including the involvement of emergency services, relevant third parties, and the general public, are in place.</p> <p>14.3. Emergency management arrangements are accessible and clearly communicated to workers and other interested parties.</p> <p>14.4. There is a process in place for the ongoing evaluation and maintenance of the emergency and crisis management system.</p> | <p>14.5. Equipment and facilities needed for emergency response are defined and readily available and maintained.</p> <p>14.6. Competent personnel are available to fulfil the defined roles in the emergency and crisis management documentation.</p> <p>14.7. A regular program of drills involving internal and external resources is used to exercise, develop and improve capabilities for a range of emergencies.</p> |
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CGS Management System		ISO Mapping			
Focus Area	Element	Quality	Safety	Environment	Asset Management
FOCUS AREA 3 - RISK MANAGEMENT	14		8.2 Emergency preparedness & response		
			4.2 Understanding the needs and expectations of workers and other interested parties		

Relevant CGS documents	
MAN-23 Group Emergency and Crisis Management	SM23 Crisis and Emergency Management System
Emergency and Crisis Management Committee Charter	Emergency Response Handbooks
G23-Q Major Accident Event Plan	QP23-10 Emergency Response Teams
External Stakeholder Engagement Guide (under development)	Regional Response Team & CMT Exercise Schedules

Element 15: Inspection and maintenance

Maintaining the integrity of plant, equipment and processes is an essential requirement for the CGS Management system.

Management must ensure that the necessary inspection, monitoring and maintenance requirements are identified and carried out to reduce the likelihood of a significant incident as a result of failure of plant, equipment or process.

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| <p>>15.1 Assets are uniquely identified on an asset register which provides up to date asset lists and equipment records, including location and equipment specification data. The asset register provides a basis for inspection and maintenance planning.</p> | <p>>15.5 Competent personnel are available to carry out the inspection and maintenance programs.</p> |
| <p>>15.2 The asset inspection and maintenance programs are risk based and address and integrate long term asset integrity and compliance assurance.</p> | <p>>15.6 There are procedures to ensure that findings and recommendations from the assets inspection and maintenance programs are appropriately prioritised and followed up.</p> |
| <p>>15.3 There are procedures to ensure that asset inspection and maintenance programs are reviewed regularly proportionate with risk, using findings from the programs, industry experience and incidents to identify and address issues and opportunities for improvement, so they are kept up to date.</p> | <p>>15.7 Inspection and maintenance programs are approved by specific competent individuals.</p> |
| <p>>15.4 Effective plans and schedules are developed for execution of asset inspection and maintenance programs.</p> | <p>>15.8 Deviations from approved inspection and maintenance programs are approved by specific competent individuals proportionate with the risk.</p> |

CGS Management System		ISO Mapping			
Focus Area	Element	Quality	Safety	Environment	Asset Management
FOCUS AREA 3 - RISK MANAGEMENT	15	9.1 Monitoring, Measurement, Analysis and Evaluation 9.2 Internal Audit			
			8.1 Operational planning and control		
Performance Standard		ELEMENT 15 CGS PERFORMANCE STANDARD			

Relevant CGS Documents	
Maintenance Requirements Analysis	QP12-22
Reliability Based Maintenance Analysis	SP12-16
Maintenance Work Order Prioritisation	SP12-30

Element 16: Management of critical equipment

An essential requirement for operational control is that Critical Equipment is in service and operating correctly.

Management must ensure that the critical equipment is identified and appropriately managed, so that they are in service and functioning correctly. Safety, environmental and compliance critical equipment has been identified through risk assessments and regular assurance activities are undertaken via the ellipse maintenance system and functional team audits.

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| <p>>16.1 Critical equipment is uniquely identified on an asset register which provides up to date asset lists and equipment records, including location and equipment specification data. The asset register provides a basis for the planning of Critical Equipment testing, inspection and maintenance.</p> | <p>>16.5 Adequate numbers of competent personnel are available to carry out the testing, inspection and maintenance programs.</p> |
| <p>>16.2 Critical Equipment testing, inspection and maintenance programs are in place. There are defined standards and programmes proportionate to the risk associated with failure of the Critical Equipment.</p> | <p>>16.6 Findings and recommendations from the Critical Equipment testing, inspection and maintenance programs are appropriately prioritised and followed up.</p> |
| <p>>16.3 Critical Equipment testing, inspection and maintenance programs are reviewed periodically proportionate with risk, using findings from the program, industry experience and incidents to identify and address issues and opportunities for improvement, so that they are kept up to date.</p> | <p>>16.7 Temporary disarming or deactivation of critical alarm, control, shutdown, security and emergency response equipment is managed and recorded.</p> |
| <p>>16.4 Effective plans and schedules are developed for execution of asset inspection and maintenance programs.</p> | <p>>16.8 Critical Equipment testing, inspection and maintenance programs are approved by specified competent individuals.</p> |
| | <p>>16.9 Disarming, deactivation or by-passing of Critical Equipment is reviewed and approved by specified competent individuals proportionate with risk.</p> |

CGS Management System		ISO Mapping			
Focus Area	Element	Quality	Safety	Environment	Asset Management
FOCUS AREA 3 - RISK MANAGEMENT	16	8.1 OPERATIONAL PLANNING AND CONTROL			
			7.5 Documented information		
			6.1.2.1 Hazard identification		
			6.1.2.2 Assessment of OH&S risks		
Performance Standard		ELEMENT 16 CGS PERFORMANCE STANDARD			

Relevant CGS Documents	
Equipment Classification	SP12-20
Fire protection systems impairment and notification	QP24-40
Asset Management of Pressure Vessels	QP09-23
Outage Planning Process	QP09-59
Control of Equipment SPOT (Single Point Of Truth)	WI05-77
Plant Change Control (PCC)	QP09-78
Defect Management Procedure	QP14-02
Handling, Storage, Packaging, Preservation & Delivery of Product	QP15-01
Inventory Management	QP09-38

Element 17: Work control, permit to work and task risk management

Management needs to ensure that effective work control, permit to work and task risk management arrangements are in place, and followed, to control the risks arising from work activities.

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| <p>>17.1 Appropriate work controls and permit to work arrangements, proportionate to the risk, are employed to assure the safety of personnel, plant, process and the integrity of the asset during work activities.</p> | <p>>17.5 Risk control measures are identified and implemented to manage the identified risk to as low as reasonably practicable</p> |
| | <p>>17.6 Completed risk assessments are reviewed and approved by specified competent individuals proportionate to the risk and any decisions are clearly identified.</p> |
| <p>>17.2 Key stages in the work control arrangements are reviewed and approved by appropriate levels of management.</p> | <p>>17.7 All of the involved parties in the planning and execution of the task are aware of task risk assessments and required control measures, process and results.</p> |
| <p>>17.3 Permit to work systems, proportionate to the risk, are employed to ensure the safety of personnel and the integrity of the asset during maintenance or work activities.</p> | <p>>17.8 Competent personnel are available to carry out the required work control, permit to work and task risk management.</p> |
| <p>>17.4 There are procedures that ensure that risks arising from work tasks are systematically identified and assessed, before work starts and as circumstances change where new risks arise during execution of work.</p> | |

CGS Management System		ISO Mapping			
Focus Area	Element	Quality	Safety	Environment	Asset Management
FOCUS AREA 3 - RISK MANAGEMENT	17	8.1 OPERATIONAL PLANNING AND CONTROL			
Performance Standard		ELEMENT 17 CGS PERFORMANCE STANDARD			

Relevant CGS Documents	
Operational Risk Management and Control of Work	QP25-16
Access Rules	AR01

Element 18: Contractor and supplier, selection and management

Contractors and suppliers who provide goods and services to Snowy Hydro are engaged through processes that include:

- Pre-qualification and inclusion in Snowy Hydro's approved contractors' list
- Tender evaluation, selection and formal contracts

Contractors and suppliers are managed through well documented procedures and their safety, health, environment and quality performance is continually monitored throughout the contract phases. Snowy Hydro gives consideration of the life cycle stages that the organisation can control or influence when engaging contractors and suppliers; considering the environmental impacts in relation to production and transportation, use and maintenance, and recycling or disposal.

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| <p>>18.1 Performance evaluation criteria are defined for third parties. Contractor and supplier compliance with legislation is a minimum requirement. The evaluation criteria are aligned to the process requirements.</p> | <p>>18.4 Effective communication and control arrangements are in place between Snowy Hydro and contractor personnel to manage the risks effectively.</p> |
| <p>>18.2 There is a process to ensure that contractor and supplier services are evaluated and selected against criteria that include an assessment of capabilities to perform work in a robust manner and meet Snowy Hydro's performance expectations.</p> | <p>>18.5 Contractor and supplier performance (in particular against required performance or product criteria) is routinely monitored and assessed, feedback is provided, and nonconformities corrected.</p> |
| <p>>18.3 All contractors are inducted and informed/trained on relevant Snowy Hydro procedures and practices, and the specific hazards associated with any work they undertake. Impacted Snowy Hydro personnel are briefed on and understand the risks arising from the contractors' activities and the necessary support or control measures. Specific focus is given to emergency procedures.</p> | <p>>18.6 Competent personnel are available to carry out the required contractor and supplier, selection and management arrangements.</p> |

CGS Management System		ISO Mapping			
Focus Area	Element	Quality	Safety	Environment	Asset Management
FOCUS AREA 3 - RISK MANAGEMENT	18		8.1 Operational Planning and Control		
		8.3 Design and Development of Products and Services			8.3 Outsourcing
		8.4 Control of Externally provided products and services			
		8.5 Production and Service Provision			
		8.6 Release of Products and Services			
Performance Standard		ELEMENT 18 CGS PERFORMANCE STANDARD			

Relevant CGS Documents	
Contractor Environment and Safety Management	SP24-16

Focus Area 4: Review and Continual Improvement

Element 19: Incident reporting and investigation

Management must ensure the timely reporting and investigation of incidents, which include near hits and the implementation of identified actions and learnings. Requirements for the management of incident actions are included in Element 20.

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| <p>19.1. A system is in place for incident reporting, investigation, follow up and capturing lessons learned from incidents.</p> <p>19.2. The reporting of incidents by all workers including contractors are obligatory.</p> <p>19.3. Incidents are classified and investigated in an appropriate timeframe proportionate to the severity of the actual or potential consequence(s).</p> <p>19.4. When an investigation is required, the investigation is to identify root causes, including human and organisational factors, and recommendations to address them are identified.</p> <p>19.5. Incidents are evaluated with the participation of workers and the involvement of other relevant interested parties.</p> | <p>19.6. There are processes in place to learn from relevant incidents and good practices in other organisations and sectors.</p> <p>19.7. Adequate numbers of competent personnel are available to carry out the required investigations.</p> <p>19.8. Completed investigations are reviewed and approved by specific levels of management appropriate to the classification of the incident.</p> <p>19.9. Where appropriate and recognising legal and security constraints, all interested parties are kept informed about the findings and recommendations from investigations.</p> <p>19.10. Senior management periodically review the effectiveness of corrective and preventative actions.</p> |
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CGS Management System		ISO Mapping			
Focus Area	Element	Quality	Safety	Environment	Asset Management
FOCUS AREA 4 - REVIEW AND IMPROVE	19	10.2 Nonconformity & Corrective Action			
		8.7 Control of Nonconforming Outputs	9.3 Management review		
			7.4.1 Communication (General)		
			7.4.2 Internal communication		

Relevant CGS Documents

[QP14-07 Incident Management](#)

[QP14-01 Action Management](#)

Element 20: Audit, assurance, management review and intervention

Management must ensure there is systematic review and audit of conformance with the 20 Elements.

This is undertaken by periodic management system audits and management reviews. The audits are reported upon to provide assurance to management and other stakeholders that the CGS elements and related processes are properly understood, implemented and executed. Where a non-conformity or an improvement opportunity is identified an action plan is developed and implemented to ensure continuous improvement at all levels.

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| <p>20.1. Performance measures are established to monitor, measure, analyse and evaluate the degree to which requirements are being met.</p> | <p>20.8. The audit program is conducted by an appropriate mix of trained, competent, multi-disciplinary personnel (including professionals) with operational and technical expertise.</p> |
| <p>20.2. Operations are routinely monitored, incorporating the performance measures, and reviewed, by specified levels of management, at predetermined frequencies.</p> | <p>20.9. The frequency and scope of the assessments will reflect the complexity of the operation, the levels of risk and previous conformance history.</p> |
| <p>20.3. The requirements of each of the 20 Elements are reviewed on a regular basis or if agreed following a significant incident. Elements will be updated as necessary to ensure they continue to meet the needs of the organisation.</p> | <p>20.10. Audit opinions and findings are reviewed with specified levels of management.</p> |
| <p>20.4. Audit criteria are defined to provide a consistent basis for audit and a consistent basis for development of the audit opinion.</p> | <p>20.11. Necessary interventions to correct identified issues, non-conformities and deviations in performance, beyond defined tolerance levels, are identified, appropriately prioritised, scheduled and tracked to completion.</p> |
| <p>20.5. Top management review the sustained suitability, adequacy and effectiveness of the CGS management system (see Appendix G).</p> | <p>20.12. Actions are to be determined and implemented in accordance with the hierarchy of controls and management of change (Element 12).</p> |
| <p>20.6. A routine internal CGS audit program is in place. The audit program assesses conformance with the requirements and the effectiveness of the management reviews.</p> | <p>20.13. Senior management periodically reviews the effectiveness of the implemented actions to adequately control root causes.</p> |
| <p>20.7. A routine independent/external level audit program is in place. The audit program assesses and provides an independent opinion on conformance with the Element requirements and the effectiveness of the management reviews.</p> | |

CGS Management System		ISO Mapping			
Focus Area	Element	Quality	Safety	Environment	Asset Management
FOCUS AREA 4 - REVIEW AND IMPROVE	20	9.1 Monitoring, MEASUREMENT, ANALYSIS AND EVALUATION			
		9.2 Internal Review			
		9.3 Management Review			
		10.2 Nonconformity & Corrective Action			
		10.3 Continual Improvement			

Relevant CGS Documents	
QP17-01 Internal Audits and Inspections	QP14-01 Action Management
Snowy Hydro Group Assurance Map (under development)	QP22-05 Performance Management
Appendix G - Mapping of 9.3 Management Review	

Appendix A: Scope of the CGS Management System

Scope Last review: January 2024	
Management System Scope Statement	
The Clean, Green and Safe (CGS) management system integrates the Quality, Environmental, Safety (inc. MAP and Dam Safety) and Asset Management processes which are implemented throughout the business across all sites to ensure the reliable, stable, safe and sustainable delivery of electricity generated through our Hydro, Diesel and Gas plants across NSW, Victoria and South Australia.	
What are our product/service sectors?	Hydro powered energy production and transmission Gas powered energy production and transmission Diesel powered energy production and transmission
Business Objectives and Success Criteria	
What do we need to do to take advantage of the opportunity, and how do we know if we are successful?	The business objectives include the requirement to meet licence conditions, comply with the requirements of the standards for maintaining certification and to meet service level agreements for production and transmission of electricity products to the clients.
Customer or Market Needs	
Who are the intended customers for our product offering and what do they need?	Market Operators are the customers of the energy generated and transmitted for distribution.
Business Risks	
Are there any risks involved with delivery of the product or service? Define them	Loss of supply, inability to meet market service level agreements. There are also risks to the environment and to the safety of personnel associated with the generation of energy which are managed, monitored and reviewed through SHLs business management systems.
Differentiation	
What makes the organisation's product/service offering different from the competition?	The production of renewable energy for commercial and domestic transmission is the point of difference to coal fired energy generation in the market.

Assumptions and Dependencies	
Were any assumptions made during the definition of the Scope? Do any other factors have an influence on the organization's success strategy?	The Scope of the CGS Management System and the Quality, Environmental, Safety and Asset Management certification does not include the retail activities of the business as well as the SnowyHydro 2.0 or HPP projects and the HEZ Power Station.
Exclusions ("Non Applicable")	
Are there any areas that should be excluded from the scope of the Management System?	There are no non-applicable clauses identified for the CGS Management System.
Operating Environment	
The environment the organisation will operate in, consider any high risk environments.	Hydro power station Gas power station Diesel power station

Appendix B: CGS Management System Accountabilities, Responsibilities and Requirements

Role	Position/s	Responsibilities	Requirements
CGS System Owners	Manager of Safety & Capability, Manager of Quality & Asset Management and Head of Environment & Lands	- Overall accountability for CGS Management System - Hold Element Owners accountable	- Provide governance, oversight and support of process - Ensure adequate resourcing of CGS Management System - Accountable for periodic checks of the CGS Management System framework to ensure its overall suitability and effectiveness. - Ensure CGS MS alignment with ISO 14001, 9001, 45001 and 55001 requirements
CGS Element Owners	Assigned by Element	- Accountable for element management and performance - Provide governance and direction for the element	- Approval of element performance standards - Accountable for performance standard reviews - Accountable for element performance & improvements - Support the prioritisation of element activities and resourcing
Program Management	Functional Teams	- Support element owners and risk owners - CGS risk management process ownership - Manage the overarching plan and reporting on CGS Management System	- SME, process management, improvement, training and assurance reporting - Support the execution of CGS Management System - Oversee the management of verification reviews - Manage the CGS management system - Provide training in the CGS Management System
CGS Committee Members	Nominated and elected individuals	- Lead CGS discussions and practices in the region - Participate in verification reviews where/as required	- Provide improvement initiatives to site managers - Mentoring other site users
Snowy Workforce	Snowy Hydro workforce	- Responsible for inspections on sites where/as required - Identify improvement opportunities - Responsibility for the impact of their activities on CGS Management System and controls	- Carry out inspections as scheduled and report controls effectiveness where/as required - Participate in SWMS, start card and site procedure reviews and risk assessments - Awareness of CGS Management System and Procedures including where copies are located on the grid - Consider, and escalate the impact of projects, plant, process or org changes on the CGS Management System. Respond as directed within the scope of the role.

Appendix C: Key Interested Parties/Operational Interfaces - Requirements, Assurance and Communication

Context statement: This table captures the interested parties that are relevant to the CGS management system, their needs and expectations that are to be addressed and the measurement processes used to maintain them. Capturing this information allows us to see what key elements are required to maintain our relationship with the interested parties.

Interested Party (who, in addition to workers are relevant to the CGS system)	Needs & Expectations of Interested Parties (What do they require?)	How is this measured and checked? (how do we ensure the expectation is achieved)	How do we Communicate / Company Requirements
Senior Management and Board	Risks and operational activities are maintained/managed appropriately and identified when needed	- Internal Audits - External Audits - Compliance/certification with Quality (9001), Safety (45001) and Environmental (14001) management system standards - Performance of CGS Management System	- Reports on the system performance - Health & Safety, Quality and Environment Management Review
Employees (Internal Customers)	- Structured, reliable and current communication - Access to and availability of information and systems - Identification of responsible officers within the business - Clear accountability under the management system.	- Feedback is received through phone, emails, Ellipse - Incident Management System - JIRA - Maintenance system - All Learn by Promoting Safety (ALPS) - hazard reporting - CGS committees - Town hall - Key Performance Indicators	- Maintain a compliant management system to ensure current and practical information is available when and where it is needed: - Town hall - Internal newsletters - CGS committees - Position Descriptions - Training and inductions
Market Operator	- Available, reliable and stable energy supply - Compliance to licence conditions and contracts	Trader monitoring and visibility of performance - SCADA	Reliability of supply
Regulators	Regulations and legislation are adhered to and considered throughout the management system. Clearly defined and communicated from regulators	Achievement of certification annually by ensuring critical compliance activities, i.e. Policy, Objectives, Internal Audit, Management Review,	Maintain a compliant management system to ensure certification continues

	• Consideration of climate change in business strategies		• External reporting of GHG and Sustainability measures and results
Suppliers	• Clearly defined scope of work and design specifications presented to suppliers prior to work. Snowy Hydro requires suppliers to adhere to specifications and provide service as expected	• Contractor Pre-qualification - 3 year cycle of renewal - Qualifications, Licences, Insurances, • Preferred supplier reviews and audits • Site assessments - Design specifications, commissioning and handover asset	• Schedule reviews of supplier performance against established criteria
Contractors including Principal Contractors	• Clearly defined scope of work and design specifications prior to work. • Known risks are controlled	• Contractor Pre-qualification - 3 year cycle of renewal - Qualifications, Licences, Insurances • Contractor evaluation and site assessments • Monitoring	• The Grid • Schedule reviews of contractor performance against established criteria, SEMP
Neighbouring utilities / shared easements	• Assets that pose a risk to third parties are inspected and maintained to ensure risks are minimised and assets are maintained to required standards	• Maintenance is undertaken as scheduled, equipment is maintained in accordance with OEM specifications and • Monitoring and assurance activities	• Meetings with stakeholder groups and regional industrial forums
Local Communities	• Risks associated with Snowy Hydro operations that have potential to impact individuals and communities are identified, assessed and controlled to an acceptable level. • Snowy Hydro is identifying and managing climate change risks	• Community engagement events and roadshows • External communication channels e.g. social media • Responsibility is allocated to develop and maintain relationships with local government and emergency response agencies	• Meetings with stakeholder groups and regional industrial forums • Facebook page • Website • External reporting of GHG and Sustainability measures and results
Visiting Public	• A safe, clean and green public environment when visiting a Snowy Hydro-controlled workplace.	• Interactions with our Discovery Centre workers • External communication channels e.g. social media	• Direct engagement • Facebook page • Website

Appendix D: CGS Element Owners

Focus Area		Element	Element Owner
1	Leadership & Workforce Capability	1. Leadership, commitment and responsibility.	Chief Operating Officer - Roger Whitby
		2. Identification and compliance with legislation, obligations and industry standards.	GM - Risk & Compliance - Glen Booth
		3. Employee selection, placement and competency, and health assurance.	Head of People Technology - Nick Oakman
		4. Workforce involvement.	Chief People Officer - Gabrielle Curtin
		5. Communication with stakeholders.	Manager of Social Impact & Community - Sarah Norris
2	Identification & Assessment of Hazards, Risks and Opportunities	6. Hazard identification and assessment of risks and opportunities.	GM - Risk & Compliance - Glen Booth
		7. Documentation, records and knowledge management.	General Manager AMT - Darren Davis
3	Management Of Risks, Opportunities & Obligations	8. Operating manuals and procedures.	General Manager Production - Maarten van der Stap
		9. Operational status monitoring and handover.	General Manager Production - Maarten van der Stap
		10. Management of operational interfaces.	General Manager Production - Maarten van der Stap
		11. Standards and practices.	General Manager AMT - Darren Davis
		12. Management of change and project management.	General Manager AMT - Darren Davis
		13. Operational readiness and plant start up.	General Manager Production - Maarten van der Stap
		14. Emergency preparedness.	Manager of Safety & Capability - Rob Cavallaro
		15. Inspection and maintenance.	General Manager Production - Maarten van der Stap
		16. Management of critical equipment.	General Manager AMT - Darren Davis
		17. Work control, permit to work and task risk management.	General Manager Production - Maarten van der Stap
		18. Contractor and supplier, selection and management.	Group Head of Finance Services - Don Tay
4	Review and Continual Improvement	19. Incident reporting and investigation.	Manager of Health & Safety, Capability & Services - Rob Cavallaro
		20. Audit, assurance, management review and intervention.	Group Head of Assurance - Judith Gonzalez Bravo

Appendix E: Risks and Opportunities

Standard	Relevant Issues	What needs monitoring?	Risks (if not controlled)	Opportunities (if controlled)	Actions	Last review date	Review Due
S	Awareness	- Pre-start conversations - Right to start sessions	- Unaware of activities happening in the area - Unaware of hazards and risks	Managed controls for identified hazards and risks	- Monitor completion of pre-start conversations - Workplace observation conversations - Inspections, Audits of the awareness element	August 2024	August 2025
Q	Customer Focus (Market Operator)	- Customer Satisfaction - measurement of compliments or complaints received - Delivery of product	Inability to meet service level agreements	Availability of energy to meet service demands	- Service Delivery - Monitoring of customer satisfaction	August 2024	August 2025
S	Communication with Externals and Internals	- Pre-start conversations / SWMS - Confirm understanding - Verification of information delivered	- Unaware of activities happening in the area - Unaware of hazards and risks	Managed controls for identified hazards and risks	- Monitor completion of pre-start meetings and WMS - Workplace observation conversations	August 2024	August 2025
Q, S, E	Improvement Reporting and Investigation	- Incident Reports - inc. near miss, hazard ID, injuries, property damage, environmental release - Investigation reports - Audit results - Inspection and Control Verifications and resulting observations or actions	Inaccurate recording of identified issues and incidents	- Trend analysis - Improved information for business decisions	- Monitoring of entered information and registers - Review and discussion of investigation reports - Review and reporting of audit results	August 2024	August 2025
Q, E, AM, S	Internal Audit	- Internal Audit Schedule - Audit Reports - Actions identified through internal audit process	Information is not available to make informed business decisions	Information in procedures and work instructions is current and practically applied	Current Internal Audit Schedule is managed	August 2024	August 2025

Standard	Relevant Issues	What needs monitoring?	Risks (if not controlled)	Opportunities (if controlled)	Actions	Last review date	Review Due
		- Resolution of Actions - Operational Reviews - Workplace Inspections, Workplace Observations	- Risk to certification - Misbehaviour or intentful non conformances not being identified. - Application of procedures and work instructions are not monitored - Integrated system processes not implemented and reviewed effectively	- Continued certification - Information is available to make informed business decisions	Internal audits are completed by appropriately competent personnel		
Q, S, E, AM	Leadership	- The alignment (business and policies) and compliance (delivery) between the business and the system - Transparency and visibility of awareness of critical risks and controls including climate change	- Lack of commitment to use system documents - Lack of ownership and accountability - Negative regulator and community response	- Improved morale - Improved behaviours - Consistency in processes across the business - Positive regulator and community response	Structured and Regular Communication	August 2024	August 2025
Q, S, E, AM	Management System Review	Inputs alignment to existing meetings held at management level	Non-compliance with certification requirements	- Clear communication - Accuracy of review of management system elements - Compliance with certification requirements	- Conduct regular management system review meetings - Annual CGS management review - Ensure input from business groups for current information	August 2024	August 2025

Standard	Relevant Issues	What needs monitoring?	Risks (if not controlled)	Opportunities (if controlled)	Actions	Last review date	Review Due
Q, S, E, AM	Management System	- Maintaining the integration - 9001, 14001, 45001, 55001 - Alignment to operations - practical implementation - Document Control	- Continued increased demand/impact of audits on business - Knowledge and access to current information	- Practical and accessible policies and procedures - Currency and availability of information when it is needed	Regular audit/review outcomes - CGS review - maintain integrated audit plans	August 2024	August 2025
Q, S, E	Operational Planning and Control	- Work Method Statements - Work Order Management system and processes	- Inefficiency - Unidentified hazards and risks	- Improved efficiency and productivity - Clear productivity expectations	Expected use of the Work order management process and program, including updating work progress	August 2024	August 2025
Q, S, E, AM	Purchasing / Procurement	- Process - engagement - Visibility of approved suppliers of services - Approved Suppliers - materials, products, services - Evaluation and review of suppliers - established criteria and evidence of review	- Unauthorised purchases - Uninsured and unqualified service providers	Controlled approved spending	- Approved suppliers processes - Approved Suppliers list availability - Controlled procurement process - Purchase order creation and use for payment	August 2024	August 2025
Q, E, S	Resources	- Correct skill and knowledge available from those recruiting for vacant roles - Expectation of Location of Roles	- Poor quality service - Poor internal business group relationships - Misinformation	- Good client (intercompany business group) relationships - Awareness and availability of required information	- Training opportunities - Performance and job satisfaction reviews	August 2024	August 2025
S, E	Resources	- Workload - Competence, knowledge - Vacant roles	- Fatigue - Loss of staff	- Shared workload - Job satisfaction - Improved morale	- Performance reviews - Employee feedback and engagement surveys	August 2024	August 2025

Standard	Relevant Issues	What needs monitoring?	Risks (if not controlled)	Opportunities (if controlled)	Actions	Last review date	Review Due
Q, AM	Resources	Competence, knowledge	- Loss of key personnel within the business - Loss of key personnel to competitors	- Company loyalty - Job Satisfaction	- Training opportunities - Performance and job satisfaction reviews	August 2024	August 2025
Q	Resources	- QC & QA activities within TQM of the system - Engagement outside of Quality team to support quality activities	- Poor quality service - Poor internal business group relationships - Misinformation	- Good client (intercompany business group) relationships - Awareness of complaints	Monitoring of complaints	August 2024	August 2025
Q, AM	Resources - Suppliers	- Supply chain health - Schedule demands	- Schedules not being met - Inadequate suppliers and materials used due to time efficiency	Long lead time to ensure high quality suppliers and materials chosen	Schedule adherence	August 2024	Closed Considered as a part of the BAU space
Q, S, E	Regulatory Compliance	- Compliance Registers - Thermal (Gas and Diesel sites) and Hydro sites, - Customer expectations - performance	- Loss of production and transmission licences - Loss of Certification - Receiving fines/notices from regulators	- Maintenance of production and transmission licences - Maintenance of certification	Provide resources to ensure maintenance of the CGS management system	August 2024	August 2024
S	Training and competence	- First Aid - Wardens - Licences - Crane, Forklift, plant operation - Competency Plans - Training Matrix - RACI, need analysis - Records - Resources	Unauthorised operators performing tasks	- Improved morale - Improved efficiency and productivity	- Monitor training and qualifications currency - Review of skills, training and qualification requirements	August 2024	August 2024
Emerging Risks: As identified during 2022 Management Review							

Standard	Relevant Issues	What needs monitoring?	Risks (if not controlled)	Opportunities (if controlled)	Actions	Last review date	Review Due
Energy crisis in the NEM during 2022 resulted in a change to the way the business was operating for short periods of time. This may be repeated going forward due to increased outages and ageing baseload power infrastructure.							
Q, S, E, AM	Regulatory Compliance	Critical processes (e.g. fuel delivery, unloading and storage)	Existing procedures may not be relevant to the new operating requirements	Availability of energy to meet service demands safely and in accordance with environmental obligations	Procedure review cycle	August 2024	Closed
Q, S, E, AM	Regulatory Compliance	Critical processes (e.g. fuel delivery, unloading and storage)	Changing compliance obligations and operational risks may require additional assessment and updating of registers.	Availability of energy to meet service demands while complying with regulatory requirements	Regular review and updates of compliance registers/obligations and operational risks	August 2024	August 2025
Emerging Risks: As identified during 2023 Management Review							
Q, S, E, AM	Resources - Suppliers	Energy market supply chains	Increased strain on energy market and reduced capability	Availability of energy to meet service demands	Monitor external impacts on the energy market and evaluate SHL position as needed	August 2024	August 2025
S	- Regulatory Compliance - Training	Implementation of psychosocial risks and controls	Potential for gaps in SHL psychosocial risk management and external compliance	- SHL workers having positive psychosocial health - SHL complying with regulatory requirements	- Continue implementation of psychosocial risks and controls - Monitor effectiveness across the business	August 2024	August 2025
Q, S, E, AM	- Regulatory Compliance - Operational Planning and Control	Increased awareness of compliance risks/reputations	Heightened awareness of business activities and limited social licence	Increase social licence and reputation of the business	- Media and external mentions - Performance and compliance with external requirements	August 2024	August 2025

Standard	Relevant Issues	What needs monitoring?	Risks (if not controlled)	Opportunities (if controlled)	Actions	Last review date	Review Due
Q, S, E, AM	- Operational Planning and Control	ESG Strategy Impact on Operations	Negative impacts to operations with change of focus	Positive impact on overall operation and social licencing of the business	Performance of the business against the strategy and against other business drivers	August 2024	August 2025
Emerging Risks: As identified during 2024 Management Review							
Q, S, E, AM	Climate Change Management	Updates to ISO standards need to be reflected in QM01	Potential for gaps in SHL climate change management and external compliance	Alignment with regulatory and certification requirements	Update relevant QM01 sections to include reference to Climate change management	August 2024	August 2025
E	Increasing Regulatory Oversight	Engagement and communications with Regulators	Increased administrative compliance burden. Lack of understanding of our operations resulting in delays for approvals/exemptions	Reduce compliance requirements. Increased confidence and engagement and better outcomes for approval/exemption requests	Review and identify improvements for Regulator engagement and management	August 2024	August 2025
S	Changes to Workplace exposure standards for airborne contaminants (2024)	No person at the workplace is exposed to an airborne contaminant at a level above the exposure limit. Monitoring requirements for airborne contaminants and health monitoring is undertaken in accordance with the new Standard.	Exposure, risk to the health and safety of workers Existing Procedures may not be relevant	Preventing exposure to airborne contaminants, monitoring health and updating Procedure/s to meet the requirements of the Standard	Crystalline Silica Management Plan and SCP drafted December 2024. Welding SCP drafted December 2024.	August 2024	August 2025
S	Changes to the Regulation of work with crystalline silica substances - Working with	Assess whether the processing is high risk, meaning it is likely to result in a risk to the health of someone at the workplace.	Exposure, risk to the health and safety of workers Existing Procedures may not be relevant	Preventing exposure, identification of high risk activities, development and implementation of a control plan	Crystalline Silica Management Plan and SCP drafted December 2024.	August 2024	August 2025

Standard	Relevant Issues	What needs monitoring?	Risks (if not controlled)	Opportunities (if controlled)	Actions	Last review date	Review Due
	crystalline silica substances						
S	Changes to Incident Notification Requirements (early 2025)	Monitor legislative (Regulation) change date.	Potential gap in Regulator reporting requirements. Existing Procedures may not be relevant. Exposure for prosecution for not reporting an incident.	Report incidents in accordance with the Regulation.	Monitor for legislative changes and implementation.	August 2024	August 2025

Appendix F: Mapping of ISO Requirements to CGS Elements

ISO Requirements				CGS Management System	
Quality	Safety	Environment	Asset Management	Focus Area	Element Number
4.1 UNDERSTANDING THE ORGANISATION AND ITS CONTEXT				FOCUS AREA 1 - LEADERSHIP & WORKFORCE CAPABILITY	2
4.1 UNDERSTANDING THE ORGANISATION AND ITS CONTEXT				FOCUS AREA 3 - MANAGEMENT OF KEY RISKS, OPPORTUNITIES & OBLIGATIONS	10
4.2 UNDERSTANDING THE NEEDS AND EXPECTATIONS OF (WORKERS AND OTHER) INTERESTED PARTIES				FOCUS AREA 3 - MANAGEMENT OF KEY RISKS, OPPORTUNITIES & OBLIGATIONS	10
4.2 UNDERSTANDING THE NEEDS AND EXPECTATIONS OF (WORKERS AND OTHER) INTERESTED PARTIES				FOCUS AREA 1 - LEADERSHIP & WORKFORCE CAPABILITY	5
4.3 DETERMINING THE SCOPE OF THE MANAGEMENT SYSTEM					2
4 QUALITY MANAGEMENT SYSTEM	4.4 OH&S MANAGEMENT SYSTEM	4.4 ENVIRONMENTAL MANAGEMENT SYSTEM			1
5.1 LEADERSHIP AND COMMITMENT					1
5.1.2 CUSTOMER FOCUS					5
5.3 POLICY	5.2 POLICY				1
5.5.1 RESPONSIBILITY AND AUTHORITY	5.3 ORGANISATIONAL ROLES, RESPONSIBILITIES AND AUTHORITIES				1
	5.4 CONSULTATION AND PARTICIPATION OF WORKERS				4
6.1 ACTIONS TO ADDRESS RISKS AND OPPORTUNITIES					2
6.1 ACTIONS TO ADDRESS RISKS AND OPPORTUNITIES				FOCUS AREA 2 - IDENTIFICATION AND ASSESSMENT OF RISKS AND	6

		6.1.2 ENVIRONMENTAL ASPECTS		OPPORTUNITIES	6
	6.1.2.1 HAZARD IDENTIFICATION			FOCUS AREA 2 - IDENTIFICATION AND ASSESSMENT OF RISKS AND OPPORTUNITIES	6
	6.1.2.2 ASSESSMENT OF OH&S RISKS				6
	6.1.2.3 ASSESSMENT OF OPPORTUNITIES				6
	6.1.3 LEGAL & OTHER REQUIREMENTS	6.1.3 COMPLIANCE OBLIGATIONS		FOCUS AREA 1 - LEADERSHIP & WORKFORCE CAPABILITY	2
	6.1.4 PLANNING ACTION				2
		6.1.4 PLANNING ACTION		FOCUS AREA 3 - MANAGEMENT OF KEY RISKS, OPPORTUNITIES & OBLIGATIONS	8
5.4 PLANNING 5.4.1 QUALITY OBJECTIVES 5.4.2 QUALITY MANAGEMENT SYSTEM PLANNING	6.2 OBJECTIVES AND PLANNING TO ACHIEVE THEM			FOCUS AREA 1 - LEADERSHIP & WORKFORCE CAPABILITY	1
	6.2 OBJECTIVES AND PLANNING TO ACHIEVE THEM			FOCUS AREA 3 - MANAGEMENT OF KEY RISKS, OPPORTUNITIES & OBLIGATIONS	13
				FOCUS AREA 3 - MANAGEMENT OF KEY RISKS, OPPORTUNITIES & OBLIGATIONS	12
5.1 MANAGEMENT COMMITMENT	7.1 RESOURCES			FOCUS AREA 1 - LEADERSHIP & WORKFORCE CAPABILITY	3
5.1 MANAGEMENT COMMITMENT	7.1 RESOURCES				1

6.2.2 COMPETENCE, TRAINING AND AWARENESS	7.2 COMPETENCE			3
6.2.2 COMPETENCE, TRAINING AND AWARENESS	7.3 AWARENESS			3
5.5.3 INTERNAL COMMUNICATION	7.4 COMMUNICATION			5
5.5.3 INTERNAL COMMUNICATION	7.4 COMMUNICATION		FOCUS AREA 3 - MANAGEMENT OF KEY RISKS, OPPORTUNITIES & OBLIGATIONS	9
5.5.3 INTERNAL COMMUNICATION	7.4.1 COMMUNICATION			19
5.5.3 INTERNAL COMMUNICATION	7.4.2 INTERNAL COMMUNICATION		FOCUS AREA 1 - LEADERSHIP & WORKFORCE CAPABILITY	5
5.5.3 INTERNAL COMMUNICATION	7.4.3 EXTERNAL COMMUNICATION			5
4.2 DOCUMENTATION REQUIREMENTS	7.5 DOCUMENTED INFORMATION	7.5 INFORMATION REQUIREMENTS	FOCUS AREA 2 - IDENTIFICATION AND ASSESSMENT OF RISKS AND OPPORTUNITIES	7
4.2.3 CONTROL OF DOCUMENTS 4.2.4 CONTROL OF RECORDS	7.5.2 CREATING AND UPDATING		FOCUS AREA 3 - MANAGEMENT OF KEY RISKS, OPPORTUNITIES & OBLIGATIONS	8
4.2.3 CONTROL OF DOCUMENTS 4.2.4 CONTROL OF RECORDS	7.5 CONTROL OF DOCUMENTED INFORMATION		FOCUS AREA 3 - MANAGEMENT OF KEY RISKS, OPPORTUNITIES & OBLIGATIONS	11
7.3 DESIGN AND DEVELOPMENT	8.1 OPERATIONAL PLANNING AND CONTROL			16
7.3 DESIGN AND DEVELOPMENT	8.1 OPERATIONAL PLANNING AND CONTROL			8
7.3 DESIGN AND DEVELOPMENT	8.1 OPERATIONAL PLANNING AND CONTROL			11

7.3 DESIGN AND DEVELOPMENT	8.1 OPERATIONAL PLANNING AND CONTROL				17
	8.1.2 ELIMINATING HAZARDS AND REDUCING OH&S RISKS			FOCUS AREA 2 - IDENTIFICATION AND ASSESSMENT OF RISKS AND OPPORTUNITIES	6
7.3.7 CONTROL OF DESIGN AND DEVELOPMENT OF CHANGES	8.1.3 MANAGEMENT OF CHANGE		8.2 MANAGEMENT OF CHANGE	FOCUS AREA 3 - MANAGEMENT OF KEY RISKS, OPPORTUNITIES & OBLIGATIONS	12
7.4 PURCHASING	8.1.4 PROCUREMENT				18
	8.1.4.1 GENERAL				18
	8.1.4.2 CONTRACTORS				18
	8.1.4.3 OUTSOURCING		8.3 OUTSOURCING	FOCUS AREA 3 - MANAGEMENT OF KEY RISKS, OPPORTUNITIES & OBLIGATIONS	18
	8.2 EMERGENCY PREPAREDNESS AND RESPONSE				14
8.2.1 CUSTOMER SATISFACTION				FOCUS AREA 1 - LEADERSHIP & WORKFORCE CAPABILITY	5
8.2.2 Determining the requirements for products and services					5
8.2.3 Review of the requirements for products and services					5
8.2.4 Changes to requirements for products and services					5
8.2.4 Changes to requirements for products and services				FOCUS AREA 3 - MANAGEMENT OF KEY RISKS, OPPORTUNITIES & OBLIGATIONS	12
8.3 DESIGN AND DEVELOPMENT OF PRODUCTS AND SERVICES					12

8.3 DESIGN AND DEVELOPMENT OF PRODUCTS AND SERVICES					18
8.4 Control of Externally provided products and services					18
8.5 PRODUCTION AND SERVICE PROVISION					18
8.6 RELEASE OF PRODUCTS AND SERVICES					18
8.7 CONTROL OF NONCONFORMING OUTPUTS				FOCUS AREA 4 - REVIEW AND CONTINUAL IMPROVEMENT	19
8.2.4 MONITORING AND MEASUREMENT OF PRODUCT 8.4 ANALYSIS OF DATA	9.1 MONITORING, MEASUREMENT, ANALYSIS AND EVALUATION			FOCUS AREA 3 - MANAGEMENT OF KEY RISKS, OPPORTUNITIES & OBLIGATIONS	9
8.2.4 MONITORING AND MEASUREMENT OF PRODUCT 8.4 ANALYSIS OF DATA	9.1 MONITORING, MEASUREMENT, ANALYSIS AND EVALUATION			FOCUS AREA 3 - MANAGEMENT OF KEY RISKS, OPPORTUNITIES & OBLIGATIONS	15
8.2.4 MONITORING AND MEASUREMENT OF PRODUCT 8.4 ANALYSIS OF DATA	9.1 MONITORING, MEASUREMENT, ANALYSIS AND EVALUATION			FOCUS AREA 4 - REVIEW AND CONTINUAL IMPROVEMENT	20
8.2.4 MONITORING AND MEASUREMENT OF PRODUCT	9.1.2 EVALUATION OF COMPLIANCE			FOCUS AREA 1 - LEADERSHIP & WORKFORCE CAPABILITY	2
8.2.2 INTERNAL AUDIT	9.2 INTERNAL AUDIT			FOCUS AREA 4 - REVIEW AND CONTINUAL IMPROVEMENT	20
5.6 MANAGEMENT REVIEW	9.3 MANAGEMENT REVIEW				20
8.3 CONTROL OF NONCONFORMING PRODUCT 8.5.2 CORRECTIVE ACTION 8.5.3 PREVENTIVE ACTION	10.2 (INCIDENT,) NONCONFORMITY AND CORRECTIVE ACTION				19

Appendix G: Mapping of 9.3 Management Review

ISO Requirement (aligned across HSEQ)	Health & Safety	Environment	Quality
a) The status of actions from previous management reviews;	Management Review and SOER / SLP meeting minutes and actions	Management Review and SOER / SLP meeting minutes and actions	Management Review and SOER / SLP meeting minutes and actions
b) Changes to external and internal issues that are relevant to the management system, including i) The needs and expectations of interested parties, including compliance obligations (*E); ii) Legal requirements and other requirements including significant environmental aspects (E); iii) Risks and opportunities;	• Monthly Executive reporting • Quarterly Executive Safety Operations and Environment Risk Committee (ESOER) • Quarterly Board Safety operations and Environment Risk Committee (BSOER)	• Monthly Group Board reporting • Quarterly ESOER • Quarterly BSOER • Annual Returns and Performance Statements	• ESOER meeting minutes • BSOER meeting minutes
c) The extent to which the policy (S) and the OH&S, environment and quality objectives have been met;	Annual safety strategy implementation and safety management system governance paper	BSOER and environmental management system governance papers	• ESOER meeting minutes • Management Review meeting minutes
d) Information on the OH&S, environment and quality performance, including trends in: i) incidents , nonconformities, corrective actions and continual improvement; ii) Monitoring and measurement results; iii) Results of evaluation of compliance with legal requirements and other requirements; iv) Audit results	• Annual safety strategy implementation and system governance paper to BSOER • Annual Emergency and Crisis system and bushfire preparedness to BSOER • Annual Health and	• Environmental management system governance paper • Annual Management Review • SLP Monthly Review, ESOER and BSOER • Environment Monthly Review	• ESOER and BSOER meeting minutes • Management Review meeting minutes

v) Consultation and participation of workers (S); vi) Risks and opportunities; e) Adequacy of resources for maintaining an effective management system; f) Relevant communication(s) with and from (E) interested parties including complaints (E) and and feedback (Q) g) Opportunities for continual improvement h) Process performance and conformity of products and services (Q) i) The performance of external providers; j) Customer satisfaction and feedback	Wellness governance paper • Annual MAP implementation governance paper		
Outputs of the Management Review - Conclusions on the continuing suitability, adequacy and effectiveness of the management system - Decisions related to continual improvement opportunities - Decisions related to any need for changes to the management system, including resources - Actions, if needed when objectives have not been achieved - Opportunities to improve integration with other business processes, if needed - Any implications for the strategic direction of the organisation Documented information is to be maintained as evidence of the results of management reviews	BSOER and ESOER meeting minutes	BSOER and ESOER meeting minutes	• BSOER and ESOER meeting minutes • Management Review meeting minutes

***(E)** - Defines if this requirement is specific to one functional area only

Appendix H: Element Owner Endorsement

Element Owner	Element(s) owned	Signature
Don Tay	18	DocuSigned by: <i>Don Tay</i> 19 February 2025 18:38 AEDT
Darren Davis	7, 11, 12, 16,	DocuSigned by: <i>[Signature]</i> 10 February 2025 15:47 AEDT
Gabrielle Curtin	4	DocuSigned by: <i>Gabrielle Curtin</i> 11 February 2025 16:00 AEDT
Glen Booth Suzannah Fletcher	2, 6	DocuSigned by: <i>Suzannah Fletcher</i> 25 February 2025 18:12 AEDT
Judith Gonzalez Bravo	20	Signed by: <i>judith.gonzalezbravo@snowyhydro.com.au</i> 12 February 2025 10:29 AEDT
Maarten van der Stap	8, 9, 10, 13, 15, 17,	DocuSigned by: <i>Maarten van der Stap</i> 12 February 2025 09:00 AEDT
Nick Oakman	3	DocuSigned by: <i>Nick Oakman</i> 11 February 2025 08:15 AEDT
Rob Cavallaro	14, 19	DocuSigned by: <i>Rob Cavallaro</i> 11 February 2025 09:49 AEDT
Roger Whitby	1	DocuSigned by: <i>Roger Whitby</i> 12 February 2025 09:30 AEDT
Sarah Norris	5	DocuSigned by: <i>[Signature]</i> 20 February 2025 14:25 AEDT