

Workplace Surveillance Policy

STAR Group is committed to safety, security and compliance in the workplace by having a Workplace Surveillance Policy. All surveillance undertaken by Star Group will be in accordance and full compliance with any applicable legislation.

Objectives

The objectives of this policy are to:

- Notify and inform workplace participants of Star Group's established means of workplace surveillance
- Ensure surveillance undertaken by Star Group is in compliance with applicable legislation
- Setting out the circumstances in which workplace surveillance and surveillance records may be used and by whom; and
- Consequences that may follow as a result of workplace surveillance.

Application

This Policy applies to employees and third parties including; contractors, subcontractors (including temporary subcontractors), customers and agents (including suppliers; manufacturers, designers and importers) that work for the Star Group, collectively referred to in this Policy as 'workplace participants' and relates to Star Group devices, equipment, property, workplace premises and company vehicles.

This policy does not form part of any contract of employment and may be varied at any time by Star Group.

Camera Surveillance

Star Group uses camera surveillance to monitor workplace safety and security.

Star Group may access the camera footage for purposes including the collection of evidence for investigations into suspected misconduct, assault, performance, safety incident, unauthorised activity, suspected theft or damage to facilities and other alleged contraventions. Camera security monitoring will be continuous and ongoing.

For the purposes of workplace participants' exposure to camera surveillance, it will effectively start upon commencement of this policy. Access to the recorded material will be strictly limited to authorised personnel.

Star Group will display visible signs at the main entrance of the workplace facilities with video surveillance. Security cameras will be located in and around facilities requiring security monitoring and will not be disguised or secreted.

Cameras in mobile phones supplied by Star Group for work related purposes are not to be used to record images or video of any persons in the workplace without their knowledge or consent.

Tracking Surveillance

Star Group engages in tracking surveillance by means of an electronic device the primary purpose of which is to monitor or record geographical location or movement (such as a Global Positioning System tracking device). This surveillance includes tracking devices installed in company vehicles in order to collect information about workplace participants' and company vehicles' location, movement, speed and distance travelled. The surveillance will be continuous and ongoing.

For the purposes of workplace participants' exposure to tracking surveillance, it will effectively start upon commencement of this policy.

Star Group will display visible signs in the company vehicles with tracking devices to inform of ongoing tracking.

Tracking surveillance may occur for reasons including:

- Monitoring a workplace participant's movements during work hours for reporting, job allocation, improvement of customer service, security, safety, productivity, efficiency and monitoring of utilisation of resources
- Providing management with ongoing location and availability of resources;
- Monitoring security and unauthorised activity of company vehicles.

Access to the recorded material will be strictly limited to authorised personnel.

Computer Surveillance

Computer Surveillance is in accordance with Star Group's Electronic Device and Communication Policy.

Security System Surveillance

Star Group may have security access systems at its buildings and facilities. Star Group may monitor workplace safety and security, and use such information in the instance of an emergency or evacuation. The surveillance will be continuous and ongoing.

Star Group may also access and use the security access records as evidence for investigations of suspected misconduct, assault, performance, safety incident, unauthorised activity, suspected theft or damages to facilities and other alleged contraventions.

Property Search

Star Group may search the property of a workplace participant (i.e. bags, parcels, lockers, cars and offices) as part of an investigation of suspected misconduct, safety, unauthorised activity, suspected theft or damages to facilities and other alleged contraventions. This includes searching for possession and supply of substances prohibited within the workplace including illicit drugs and alcohol. A person authorised by the Board of Directors will conduct such a search.

Disclosure of Surveillance Records

Star Group will only use and/or disclose surveillance records to an external party:

- to an officer of a law enforcement agency regarding the detection, investigation or prosecution of an offence;
- for a purpose that is related to the tracking of civil and criminal proceedings; or

- where it is necessary to avert an imminent threat of serious violence to persons or of substantial damage to property.

Access of Surveillance Records

Only the Board of Directors or person approved by the Board of Directors can authorise access of surveillance records and data for the purposes outlined in this policy.

Your Commitment

A workplace participant must not wilfully damage, misuse or tamper with any surveillance equipment, device or system.

All workplace participants must cooperate and comply with the policy and any related workplace procedures and instructions.

CHRIS MULVEY
GROUP MANAGING DIRECTOR
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