



Health & Safety

Critical Risks

FATIUGE

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1. Overview

SkyCity Entertainment Group Ltd (SkyCity) recognises Fatigue as one of its Health and Safety (**H&S**) critical risks. Fatigue can be best described as a state of mental or physical exhaustion which can potentially impact on a person's ability to perform work safely and effectively.

2. Purpose

The purpose of this standard is to:

- Ensure that, so far as is reasonably practicable, steps are taken to eliminate risks arising from worker fatigue, or to minimise those risks when elimination is not feasible, at any site under SkyCity's legal control; and
- Set out SkyCity's requirements for its Suppliers who can influence or control any matter related to such risks when workers are fatigued at a SkyCity site.

In this Standard, a Supplier refers to any entity other than SkyCity that provides goods or services at a site under SkyCity's legal control. This definition includes Owners, Vendors, Businesses, Tenants, Franchises, Contractors, and Third-Party Contractors.

3. Scope

This document sets out the standard and framework that apply to SkyCity and its Suppliers when identifying and managing hazards and risks associated with fatigue at any SkyCity site.

4. Responsibility

All persons involved in managing fatigue (and its associated risks) must actively fulfil their role in meeting their responsibilities under this Standard. This applies to SkyCity Leader, General Managers, People Leaders, Suppliers, and Contractors.

4.1. Responsibilities of SkyCity Business Departments

SkyCity Business Departments are responsible for managing and supporting fatigue risk controls within their areas of responsibility, as outlined below:

- a) Act on any reasonable request or instruction from SkyCity to apply the requirements of this Standard and relevant health and safety legislation and guidelines
- b) Support Employees in eliminating or minimising fatigue-related risks by applying SkyCity's Fatigue Absolute Critical Risk Controls and relevant health and safety legislation and guidelines
- c) Conduct risk assessments, where applicable, for work activities involving fatigue and associated risks
- d) Maintain up-to-date knowledge of fatigue and related risks

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4.2. Responsibilities of SkyCity Suppliers

SkyCity Suppliers are expected to meet the following requirements when operating at a SkyCity site:

- a) Ensure that, so far as is reasonably practicable, risks in work areas are eliminated or minimised, and address any risk-related matters when workers are fatigued at a SkyCity site.
- b) Ensure workers are provided with the content of this Standard for managing fatigue at a SkyCity workplace.
- c) Maintain up-to-date knowledge of fatigue and associated risks.

5. Definitions

Acronym/Phrase	Definition
Critical Risk Framework	A structured approach is used to identify, assess, and manage risks that have the potential to cause significant harm or catastrophic outcomes within SkyCity.
Critical Risk Owners	SkyCity Leaders and groups who are in a better position to manage, control, monitor and review the ongoing effectiveness of SkyCity's absolute critical risk controls
Critical H&S Risks	A focus on infrequent but high-consequence health and safety risks that have the potential to cause serious harm or significant financial or business impacts.
Fatigue	A state of mental and/or physical exhaustion which can potentially impact a person's ability to perform work safely and effectively
Fatigue Factors	Work and non-work-related issues can contribute to fatigue, which can affect a person's health and increase the risk of workplace injury and illness occurring.
H&S Risk Assessment	Risk assessment is a structured process used to ensure health, safety, and well-being risks are effectively eliminated, reduced, or controlled.
H&S Risk Management Process	A process for identifying hazards, assessing risks, applying control measures to eliminate or minimise those risks, monitoring their effectiveness, and regularly reviewing those controls
Reasonably Practicable	Reasonably practicable means providing the highest level of protection that can be achieved by weighing the level of risk against the time, cost, and effort required to control it.
Residual Risk	The level of risk that remains after control measures have been implemented. When controls are effective, the residual risk is always lower than the original, uncontrolled risk

6. Fatigue Risk Management Framework

6.1. Critical Risk Owners

Fatigue can negatively affect any SkyCity Employee, Supplier, or Contractor. Accordingly, all relevant business areas and department leaders and managers are considered critical risk owners for managing fatigue in the workplace.

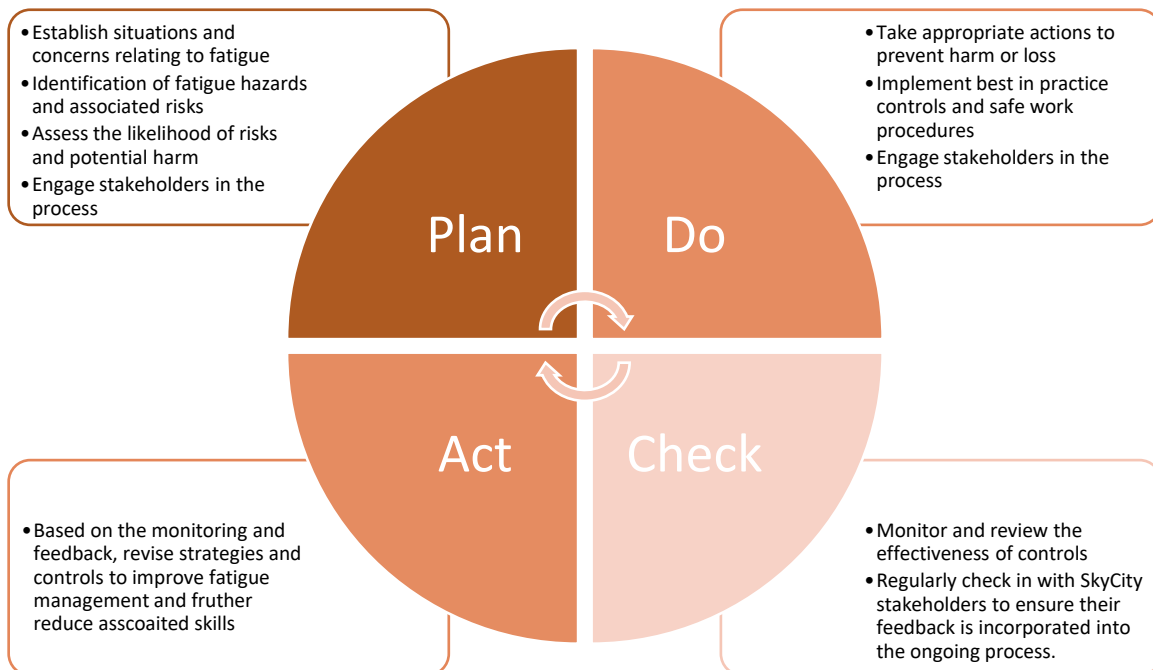
6.2. SkyCity’s Health and Safety Critical Risks

SkyCity has identified fatigue as a critical health and safety risk, as inadequate controls can disrupt operations and cause serious harm, including death, chronic health conditions, and psychological injury. Through employee consultation and an advanced risk assessment tool, SkyCity reviewed fatigue-related risks, identified potential harm factors, and established the absolute controls needed to manage them effectively.

6.3. Fatigue Risk Management Process

SkyCity must ensure, so far as is reasonably practicable, that the health and safety of its workers and others is not put at risk by its work activities. Risks arising from work, including fatigue, must be eliminated, and where elimination is not possible, they must be minimised so far as is reasonably practicable.

The following risk management process is to be applied where SkyCity knows or assumes that fatigue is present:



6.4. Identification

SkyCity will ensure, so far as is reasonably practicable, that fatigue-related hazards and risks at its worksites and within work tasks are identified as the first step in the risk management process.

To support this, SkyCity will consult with key stakeholders—including People Leaders, the Health and Safety Team, and Ambassadors—when identifying hazards and risks that may contribute to harm or loss arising from fatigue in the workplace.

The following examples outline both work-related and non-work-related factors that may increase the risk of a person becoming fatigued at work.

Work-Related Factors	Non-Work Related Factors
<ul style="list-style-type: none">• Extended hours of work• Early or late shifts• Inadequate recovery time or insufficient sleep between shifts.• Poor job design• High job demands• Environmental conditions (e.g., noisy work, extreme heat and cold)• Physical demanding work• Role clarity, control, or conflict	<ul style="list-style-type: none">• Employees working secondary employment.• Extended travelling time to and from work• Emotional or personal stressors• Ill health or long-term pain and discomfort• High level of community and social obligations• Unhealthy lifestyle choices

6.5. Risk Assessment

SkyCity People Leaders, in consultation with employees and, where appropriate, the SkyCity H&S team, must conduct risk assessments to evaluate and control hazards and risks that could cause harm, including injuries and short- or long-term health effects. This process includes agreeing on priorities and ensuring that all identified factors—both work-related and non-work-related—are considered within the same risk assessment

When assessing fatigue-related risks, all identified factors must be considered within the same process. The assessment focuses on determining the likelihood of a person becoming fatigued at work and the potential consequences and severity of harm. Together, these elements establish the overall level of fatigue risk and support the identification and prioritisation of appropriate control measures

Refer to the *HSMS SOP – Risk Assessment Methodology* for further details on conducting a risk assessment.

6.6. Controls

SkyCity will ensure, so far as is reasonably practicable, that fatigue-related risks are eliminated wherever possible. Where elimination is not feasible, alternative control measures will be implemented to minimise risks to the lowest practicable level. The hierarchy of risk control will be applied when selecting fatigue-related controls, in accordance with the HSMS Standard – Risk Management.

Where work may give rise to fatigue risks, the following Fatigue Absolute Risk Controls must be incorporated into the overall risk control measures:

- Job design and planning
- Fitness for work
- Employee support
- Training and capability

For a full description of Fatigue Absolute Controls, refer to [Donesafe](#).

Once the appropriate risk controls have been agreed and selected in consultation with employees, the relevant SkyCity Business Department must reassess the residual risk. This confirms that the controls applied are sufficient to reduce the likelihood of injury, illness, or loss.

6.7. Monitoring and Review

6.7.1. Monitoring

Once the risk assessment has been completed and the agreed risk controls and safe work procedures have been implemented, the relevant SkyCity Business Department must monitor their effectiveness. This ensures that fatigue risks remain adequately controlled in line with the risk management process.

Each Business Department is responsible for establishing and implementing an appropriate monitoring program, which should include active methods such as audits, inspections, employee surveys, and, where applicable, workplace safety observations.

SkyCity will also regularly review fatigue-related incidents and hazard reports submitted through the SkyCity H&S Platform (Donesafe). This reactive monitoring helps identify trends and areas requiring further attention or improvement, ensuring fatigue risks are consistently and effectively managed.

6.7.2. Review

SkyCity will ensure, so far as is reasonably practicable, that each Business Department reviews the performance of its fatigue risk control measures as required. The following methods and situations will be considered when reviewing, addressing, and improving fatigue risk controls:




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- Addressing fatigue issues, emerging trends, and improvement opportunities identified through workplace monitoring
- Considering any industry changes related to fatigue risk management
- Responding to risk assessments that highlight shortcomings in existing control measures
- Periodically reviewing the department's Hazard and Risk Register

7. Employee Guidance for Managing Fatigue

7.1. Signs of fatigue

Remember, employees in physically or mentally demanding roles are not the only ones at risk of fatigue—non-work-related factors can affect anyone. Be alert to the following common signs of fatigue in yourself or those you work with:

 Physical Symptoms	 Cognitive Symptoms	 Emotional/Behavioural Symptoms
<ul style="list-style-type: none">▪ Chronic tiredness or sleepiness▪ Headache▪ Dizziness▪ Sore or aching muscles▪ Muscle weakness▪ Blurry vision	<ul style="list-style-type: none">▪ Slowed reflexes or responses▪ Impaired decision-making and judgment▪ Poor concentration▪ Short-term memory problems	<ul style="list-style-type: none">▪ Moodiness, such as irritability▪ Low motivation▪ Appetite loss

7.2. Managing Fatigue

SkyCity will consider work-related factors that may contribute to fatigue, while recognising that many non-work-related factors—often linked to sleep, lifestyle, or personal circumstances—also influence how fatigued a person feels at work. These non-work factors are largely managed by individuals through their own out-of-work behaviours. This section provides People Leaders and Employees with practical strategies to help manage these contributors to fatigue.

7.2.1. Guidance for People Leaders

Factors	Suggested ways to manage
Extended hours of work	<ul style="list-style-type: none"> • Develop procedures to manage and limit excessive working hours, including requiring regular minimum breaks, especially during longer shifts • Avoid work arrangements that incentivise employees to work excessive hours • Monitor cumulative hours worked through weekly timesheets or reports, and act when necessary • Ensure adequate staffing coverage during annual or sick leave; if overtime is required, plan it in advance so employees can manage their personal commitments accordingly
Shift work	<ul style="list-style-type: none"> • When 12-hour shifts are worked, no additional hours should be offered • Avoid long working hours (more than 50 hours per week) • Limit back-to-back 8-hour shifts, and avoid them entirely when using 12-hour shifts • Rotate shifts frequently (e.g., every 2–3 days) • Schedule regular weekends off, ideally at least every three weeks • Use forward-rotating shifts (morning → afternoon → night) as the preferred approach
Early or late shifts	<ul style="list-style-type: none"> • Restrict the number of night shifts where possible • Provide at least two days off after completing night shifts • Avoid assigning employees to permanent night-shift patterns • Shift early start times forward when possible (e.g., 7 a.m. instead of 6 a.m.) • Limit successive early starts (before 7 a.m.) to a maximum of four where practicable • Keep early-start shifts shorter to reduce the risk of fatigue later in the shift
Job Design	<ul style="list-style-type: none"> • Redesign work tasks to reduce prolonged periods of mental or physical fatigue • Structure work hours and rosters to support adequate sleep and allow sufficient recovery time between shifts for travel, meals, and rest • Provide clear instructions and role expectations across the team to ensure everyone understands “who is doing what”
Job Demands	<ul style="list-style-type: none"> • Ensure fit-for-purpose machinery and equipment are used in the workplace, such as ergonomic tools and lifting devices for handling loads

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	<ul style="list-style-type: none">• Encourage workers to report any concerns they have about work-related fatigue• Introduce job rotation to help prevent the build-up of mental and physical fatigue• Plan for expected workflow changes, including anticipated peak periods throughout the year
Environmental conditions (e.g. noisy work)	<ul style="list-style-type: none">• Ensure workplace lighting levels are sufficient for employees to work safely and operate equipment and facilities• Maintain workplace temperatures that provide reasonable comfort without requiring additional or specialised clothing• Provide adequate facilities for rest, sleep, meal breaks, and other needs where applicable• Maintain a workplace that is well lit, safe, and secure

7.2.2. Employee 10 quick tips for managing fatigue

<p style="text-align: center;">1</p> <p style="text-align: center;">Get Better Sleep</p> <ul style="list-style-type: none"> • Go to bed earlier • Establish a consistent night-time routine • Keep the bedroom completely dark • Switch off electronic devices before bed • Minimise interruptions during sleep • Avoid delaying your bedtime • Aim for 7–9 hours of uninterrupted sleep each night 	<p style="text-align: center;">2</p> <p style="text-align: center;">Get 30 Mins of Daylight every Day</p> <ul style="list-style-type: none"> • Take regular morning breaks • Hold walking meetings outdoors • Use a bright-light therapy lamp during morning reading or desk work • Swap a short break for a brief walk outside to boost alertness 	<p style="text-align: center;">3</p> <p style="text-align: center;">Drink More Water</p> <ul style="list-style-type: none"> • Always keep a glass or bottle of water nearby; bringing your own water bottle can help • Replace some of your usual drinks—such as soft drinks, energy drinks, or coffee—with water • Don't wait to drink; thirst is a sign that you may already be dehydrated 	<p style="text-align: center;">4</p> <p style="text-align: center;">Take Regular Recovery Breaks</p> <ul style="list-style-type: none"> • Rest your eyes • Read a book • Take a power nap • Take a restroom break • Take your lunch breaks and don't skip lunch • Move more, sit less – reduce sedentary behaviours such as using computers • Try break up long bouts of sitting 	<p style="text-align: center;">5</p> <p style="text-align: center;">Increase movement throughout the day</p> <ul style="list-style-type: none"> • Get up from your desk periodically to increase standing time • Walk to see a colleague instead of emailing or video calling • Use breaks to get up and walk around • Schedule more stimulating tasks for times when you typically feel drowsy
<p style="text-align: center;">6</p> <p style="text-align: center;">Eat healthy and nutritious food</p> <ul style="list-style-type: none"> • Eat breakfast to spark your energy • Eat regular, light meals or snacks rather than heavy meals • Choose foods that are easy to digest, such as pasta, fruit, and vegetables • Avoid fatty, spicy, or heavy meals • Limit sugary foods, as they provide only a short-term energy boost 	<p style="text-align: center;">7</p> <p style="text-align: center;">Individuals' responsibility</p> <ul style="list-style-type: none"> • Balance family and social commitments so you can get enough rest before work • Maintain fitness and eat a healthy, balanced diet • Use days off to recover and prepare for upcoming workdays • Make sleep a priority to support overall wellbeing and alertness 	<p style="text-align: center;">8</p> <p style="text-align: center;">When Driving</p> <ul style="list-style-type: none"> • Never drive when you feel sleepy • Take regular breaks during long drives, ideally every two hours • Travel with another passenger who can share the driving when possible • Stop if you become drowsy and take a short nap, provided it is safe to do so 	<p style="text-align: center;">9</p> <p style="text-align: center;">Take care with stimulants (caffeine)</p> <ul style="list-style-type: none"> • Use it only when needed, not when already alert • Avoid taking it within five hours of bedtime • know your limits and watch for overuse • Avoid regular use of sleeping pills or sedatives due to dependency risks 	<p style="text-align: center;">10</p> <p style="text-align: center;">Learn de-stress and relaxation techniques</p> <ul style="list-style-type: none"> • Take slow, deep breaths • Focus your attention on what is happening in the present moment • Take regular walks to reset and clear your mind • Practise being assertive rather than aggressive

8. Change Log

Version	Date of Change	Authorised By	Amendment Details
1.0	12/02/2026	Paul Uttley – Group GM Health & Safety	- New Standard