

Twelve obligations split into requirements and commitments, each with owner, control and evidence

ISO 37301 separates compliance REQUIREMENTS (what you must comply with) from compliance COMMITMENTS (what you choose to comply with). Both belong in this register and both are auditable once adopted — the common failure is treating a published voluntary commitment as marketing. A worked template, not legal advice: always confirm the current instrument and its application in your jurisdiction.

REF	OBLIGATION	TYPE (REQUIREMENT / COMMITMENT)	SOURCE INSTRUMENT	JURISDICTION	APPLIES TO	OWNER	CONTROL THAT SATISFIES IT	EVIDENCE RETAINED	MONITORING FREQUENCY	CONSEQUENCE OF NON-COMPLIANCE	LAST REVIEWED	CLAUSE
CO-01	Maintain a compliant work health and safety management system	Requirement	Model WHS Act and Regulations as adopted in each state	AU — state-adopted	All sites and workers	Head of HSEQ	ISO 45001-aligned OH&S management system with hazard register and consultation	Hazard register, incident records, consultation minutes, training records	Monthly	Regulatory enforcement; officer duties are personal	2026-07-01	4.5, 8.1
CO-02	Handle personal information in line with the Australian Privacy Principles	Requirement	Privacy Act 1988 (Cth)	AU — Commonwealth	All entities handling personal information	Privacy Officer	Privacy policy, collection notices, APP-mapped controls, breach response plan	Privacy policy versions, breach register, training completion	Quarterly	OAIC enforcement; notifiable data breach obligations	2026-06-15	4.5, 8.1
CO-03	Prevent bribery by employees and associates	Requirement	Criminal Code Act 1995 (Cth), as amended by the Crimes Legislation Amendment (Combatting Foreign Bribery) Act 2024	AU — Commonwealth, extraterritorial	Group and all associates	Anti-Bribery Function	ISO 37001-aligned ABMS: risk assessment, due diligence, financial and non-financial controls	Bribery risk register, due diligence files, gifts register, training records	Quarterly	Corporate liability; adequate procedures is the statutory defence	2026-07-20	4.5, 8.1
CO-04	Meet AML/CTF program obligations	Requirement	Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)	AU — Commonwealth	Reporting entities within the group	AML/CTF Compliance Officer	Documented AML/CTF program, customer due diligence, transaction monitoring	Program document, CDD records, reporting logs, independent review	Monthly	AUSTRAC enforcement and civil penalties	2026-06-30	4.5, 8.1
CO-05	Protect eligible whistleblowers from detriment	Requirement	Corporations Act 2001 (Cth), whistleblower protections	AU — Commonwealth	All entities and officers	General Counsel	Whistleblower policy, protected disclosure channel, investigation procedure	Policy, disclosure register (access-controlled), investigation outcomes	Quarterly	Civil and criminal penalties; policy is mandatory for public and large proprietary companies	2026-06-30	4.5, 8.1
CO-06	Report greenhouse gas emissions and energy data	Requirement	National Greenhouse and Energy Reporting Act 2007 (Cth)	AU — Commonwealth	Group facilities above threshold	Sustainability Manager	Energy and emissions data collection, assurance, annual report	Source data, calculation workbook, submission receipt	Annual	Clean Energy Regulator enforcement	2026-05-31	4.5, 9.1
CO-07	Hold and maintain construction and trade licences	Requirement	State licensing legislation	AU — per state	Operating entities and nominated supervisors	Commercial Manager	Licence register with expiry alerts and nominee tracking	Licence certificates, renewal confirmations	Quarterly	Inability to contract lawfully; contract termination rights	2026-07-10	4.5, 8.1
CO-08	Comply with Commonwealth Procurement Rules when tendering	Requirement	Commonwealth Procurement Rules	AU — Commonwealth	Bid and delivery teams	Bid Director	Tender compliance checklist, conflict declarations, records retention	Bid files, declarations, correspondence log	Per tender	Exclusion from procurement; contract consequences	2026-06-20	4.5, 8.1

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CO-09	Apply the group Code of Conduct	Commitment	Internal Code of Conduct	Group-wide	All personnel and contractors	Chief People Officer	Annual acknowledgement, induction module, disciplinary framework	Acknowledgement records, training completion, case register	Annual	Internal disciplinary action; reputational exposure	2026-04-30	4.6, 8.1
CO-10	Meet published modern slavery commitments in the supply chain	Commitment	Public modern slavery statement and supplier code	Group-wide supply chain	Procurement and suppliers	Procurement Lead	Supplier questionnaire, risk-tiered assessment, remediation process	Supplier assessments, statement, remediation records	Annual	Reputational and customer contract exposure; statement is publicly testable	2026-05-15	4.6, 8.1
CO-11	Maintain ISO 9001 certification as committed in tenders	Commitment	Customer contracts and tender responses	AU and NZ	Delivery entities	Quality Manager	Certified QMS with internal audit and management review	Certificate, surveillance audit reports, internal audit programme	Per surveillance cycle	Contractual breach; prequalification loss	2026-06-01	4.6, 8.1
CO-12	Honour community and traditional owner agreements	Commitment	Negotiated community agreements	Project-specific	Project teams	Community Relations Lead	Agreement obligations tracked per project with named owners	Agreement register, meeting minutes, commitment tracker	Quarterly	Social licence loss; project delay; reputational exposure	2026-07-05	4.6, 8.1

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