

Chain of Responsibility Policy

What is Chain of Responsibility National Heavy Vehicle Legislation (CoR)?

Everyone within the supply chain has a responsibility to ensure that all reasonable and practicable steps are taken to improve safety within the transport and distribution industry.

The National Heavy Vehicle Law Act 2012 (NHVL) extends legal responsibilities to all parties within the supply chain for their actions, omissions or demands that influence or control activities within the chain.

(ABC Pty Limited) will not knowingly request or require any employee, contractor, or agent to undertake any tasks that will give rise to a dangerous or potentially dangerous situation or do anything that would breach any legislative obligation.

This policy applies to all employees, and you should also consider your actions and decisions with regard to parties you engage with internally and externally, including contractors and agents that engage or are engaged by (ABC Pty Limited) directly or indirectly and that have responsibilities under the CoR requirements of the NHVL and fall within the scope of the legislation. This may include, but is not limited to:

- Consignors
- Consignees
- Loaders and unloaders
- Packers
- Other operators

The core elements of the COR Compliance Management System have been identified by the National Heavy Vehicle Regulator and relates specifically to:

- Speed
- Load Restraint, Mass and Volume
- Vehicle Maintenance
- Fatigue Management

It is important that each employee has an understanding of their own responsibilities with respect to the COR regulations and is committed to ongoing compliance in this regard. All parties should consider their actions and if in doubt, seek assistance or guidance.

(ABC Pty Limited) has a zero-tolerance approach for deliberate breaches of COR procedures and protocols. Penalties for a breach of COR legislation can extend not just to the company, but also to employees and individuals themselves.

The COR policy will be carried through the CoR programme which includes:

- Active commitment and participation by company Executives, management and all staff.

- Identification, control, escalation and rectification of any non-conformities.
- Open, non-discriminatory participation and consultation with and by all employees of all elements relating to CoR and any risk or noncompliance matter.
- Provision of feedback, evaluation, review and implementation process of policies and procedures.
- Provision of resources and training of staff in all applicable elements of CoR compliance.
- Review process of the policy and procedures to ensure validity and continuous improvement of systems and training to achieve the best outcomes.

It is the responsibility of each employee to notify the executive or management of any identified non conformities or potential non conformities.

(ABC Pty Limited) will ensure that training, resources and procedures are provided to assist each responsible employee in achieving these compliance objectives.

Every action you take will be a contributing factor in the COR compliance chain and your positive actions will contribute to a safer workplace and industry.

COR POLICY AND OVERVIEW

Each of the four elements of the CoR requirements will be addressed under their own policies and procedures.

Speed Management

(ABC Pty Limited) will not endorse, incentivise, schedule work or pressure drivers, contractors or agents to exceed speed limits.

Our approach to speed management will include, but is not be limited to:

- Appropriate scheduling and allocation of work to employees, contractors and agents.
- Completion and review of driver trip schedules.
- Consultation with drivers and contractors.
- Determining distances and speed to complete the journey within legal requirements.
- System for accessing GPS records, where available, for trips and provide reports to drivers and applicable staff on identified incidents of speeding and counselling in line with company policy.
- Journey contingency plans that may be required.
- Training of drivers and all staff responsible for scheduling or with influence or control over work allocation.
- Undertake suitable Speed Limiter Compliance requirements.

Fatigue Management

Fatigue can reduce a person's ability to execute their duties to the best of their ability and has been identified as a cause of injury, death and road incidents.

(ABC Pty Limited) will take all practicable steps to mitigate any risks that have a relationship with fatigue and provide resources to assist with the identification management and control of fatigue related incidents.

Our approach to fatigue management will include, but is not be limited to:

- Appropriate scheduling and allocation of work to employees, contractors and agents.
- Completion and review of work and trip schedules and ensure sufficient flexibility to comply with Basic Fatigue Management requirements.
- Consultation with drivers, contractors and agents.
- Contingency plans that may be required during the course of the work.
- Assessment practices to determine fitness for duty.
- Training of drivers and all staff responsible for scheduling or with influence or control over work allocation.

Mass, Dimensions, Load Restraint

The NHVL requires compliance with and stipulates those requirements for mass, dimension and load restraint. Proper management of loads affects the safety of employees, clients and all road users. Improper management of a load could create:

- A load restraint risk and potential for load shift.
- Increase braking distances.
- Vehicle instability.
- Increased costs through additional wear and tear as well as increased fuel costs.
- Heavy penalties for breaches.
- Possible contraventions of Australian Consumer Law if you are unable to complete the service within the contracted time frame.
- Accelerates wear and tear to roads and infrastructure.

Our approach to manage mass, dimensions and load restraint compliance will include, but is not limited to:

- Appropriate systems and procedures to ensure that accurate load weights are determined or estimated and that GVM limits for vehicles used are not exceeded.
- Appropriate systems and procedures to ensure correct distribution of loads within vehicles to meet regulatory requirements and minimise risk of vehicular instability.
- Proper and accurate documentation and CWD to be completed and available to all required parties that would be within the supply chain.
- Consultation with drivers, contractors and agents on relevant matters on mass, dimension and load restraint.

- Training of identified staff and drivers in dimension, mass and load restraint management and application.

Maintenance

Properly maintained vehicles are critical to the safe and efficient operation of the business. It is the responsibility of drivers, operational staff and management to ensure that all vehicles are maintained in accordance with manufacturer's requirements and in a legal and roadworthy condition at all times. Properly maintained vehicles ensure:

- A safe working environment for staff and drivers as well as the general public and other road users.
- Maximise return on investment of our vehicles.
- Improve productivity through maximum utilisation of vehicles.
- Ensure best possible service standards and reliability for clients, other contractors and agents.
- Minimise reputational risk by executing job requirements and exceeding client expectations.

(ABC Pty Limited) will achieve this by:

- Implementing a system that will manage and undertake service requirements as per manufacturer's specifications and manage service intervals.
- Implement and document a daily checklist for all vehicles that is to be completed and assessed prior to leaving the depot.
- Implement a system that will report on any identified faults and rectification of those faults.
- Implement an escalation process based on urgency and severity of a discovered fault.
- Implement a system in line with TEARS - Truck Emergency Breakdown and Roadside Safety, or similar for any faults or failures that occur or are identified whilst away from the depot.

Contractors, Agents and responsible parties in the Chain

Responsibility for compliance rests with not just all staff at (ABC Pty Limited), but also all parties within the supply chain. CoR extends legal liabilities to all parties including individuals with the chain, who by their actions, inactions or demands exercise control or influence within in the movement and handling of items through the supply chain.

Contracts or commercial arrangements between (ABC Pty Limited) and other parties, both up and down the supply chain, should not be entered into without proper due diligence into their policies procedures and systems to ensure they meet their obligations under CoR.

Systems, policies and practices in line with compliance requirements for:

- Speed Management
- Fatigue Management



- Load restraint, Mass and Dimension Management
- Maintenance Management

Should be evidenced prior or engagement and ongoing compliance should also be evidenced as far as reasonably practicable.

Contracts or commercial arrangements initiated by (ABC Pty Limited) will not result in, encourage or incentivise any third party to breach CoR requirements or any other laws.

Breaches of this Policy

Breaches of this policy may result in disciplinary action which may include counselling or even summary dismissal. In the event of contractors, agents or other third parties, breaches or non-compliance could lead to a termination of contracts or arrangements.