



**FREIGHT HUB**

- BEVERAGE LOGISTICS -

DELIVERING AUSTRALIA'S WINE & BEVERAGES

FIRST CLASS. ON TIME. EVERYDAY.

## **CHAIN OF RESPONSIBILITY (COR) POLICY & INCORPORATING COMPLIANCE WITH THE SAFETY OF LIFE AT SEA CONVENTION (SOLAS) & FATIGUE MANAGEMENT POLICY**

**OUR PURPOSE-** Freight Hub Logistics Pty Ltd is committed to enforcing compliance to national Chain of Responsibility (CoR) Legislation, by taking all reasonable, practicable measures to provide training of staff, and engage only those Transport Contractors who demonstrate through appropriate work practises, and proven policy documentation, compliance with CoR legislation. The purpose of this CoR and SOLAS Policy is to document our working commitment to Australian Road Transport & Maritime Industry participants, and to the broader community in general, that our business complies with, and acknowledges its obligation and responsibilities in keeping people and property, and the environment safe.

**SCOPE-** This policy forms part of the Freight Hub Logistics compliance strategy. It applies to all owners, managers, employees, contractors, and visitors, of the Freight Hub (group of companies), that have responsibility for, or involvement in, activities that fall within the scope of Australian road transport laws. This includes roles within logistics supply chain, and support roles, and extends to ALL suppliers to Freight Hub Logistics, including its customers.

**POLICY-** The Chain of Responsibility Policy is relevant for all areas of Freight Hub Logistics, particularly in the areas of transport broker operations, and warehousing and transport operations.

The four main elements of the CoR Policy are:

- Mass & Dimension Limits – Ensuring that all vehicles and export shipping containers leave our sites within their mass carrying constraints, and that the mass is distributed appropriately across the loading deck or container with respect to axle weight limits, and safe (shipped) load mass distribution, and that the load is within dimension limits.
- Ensure that mandatory SOLAS verified gross mass weight details for export consignments are declared using weight calculation method 2 – all contents weighed, recorded and reported prior to packing.
- Load Restraint – Ensuring that when vehicles and containers are loaded, cargo is adequately secured for safe road or ocean transport; and in the case of goods receiving, that loads are carefully checked for load restraint compliance and safe unitised condition before handling, to ensure the safety of unload personnel and operations staff generally.
- Driver Fatigue – Ensuring that drivers are well rested and provided adequate time to take scheduled rest breaks, and ensuring that sub-contractors have in place fatigue management

policy and strategies that comply with driver fatigue legislation of hazards and ensuring all reasonable measures are taken towards effective minimisation of any foreseeable risks to health and safety.

- Speed Limits – Ensure that driver routes are well planned, and that scheduling of collections and deliveries does not impose demands on drivers and staff that may result in breaches of road speed limits, or contribute to unsafe work practises. Such planning must always remain operationally dynamic, ensuring unplanned delays encountered during scheduled work, do not contribute to driver pressures which could require them to complete work in a shorter timeframe, and to possibly engage in unsafe driving practises as a result.

**VEHICLE COMPLIANCE** - Freight Hub Logistics ensures operating vehicles, and those of our partner carriers are fully compliant. It is therefore a requirement at Freight Hub Logistics that any heavy vehicle(s), (defined as a vehicle that has a Gross Vehicle Mass – GVM of more than 4.5 tonnes), has the following information verified prior to engagement of work

- Vehicle is registered.
- Vehicle is insured.
- Maintenance records are in order and up to date.
- Vehicle is fit for purpose on general presentation and inspection.
- Vehicle GVM.
- Appropriate load restraints in place prior to loading.
- Speed limiters are fitted and functional on regulated heavy vehicles (GVM of more than 12 tonnes).
- Current public liability and vehicle insurances on file and maintained.

**DRIVER COMPLIANCE**- Freight Hub Logistics ensures that any driver engaged to do work on its behalf, have the following information verified prior to commencement, and that it is maintained for the duration of any such engagement:

- Appropriate class and current Australian Heavy Vehicle Drivers License.
- Current NHVAS driver medical certificate proving fitness to drive.
- RTWSA registration is current.

**FATIGUE MANAGEMENT**- Freight Hub Logistics takes all reasonable steps to ensure all parties in the supply chain with which it is directly involved, identify risks associated with fatigue, and that they are minimised and controlled, or wherever possible eliminated through good management and workplace practises. Compliance and enforced management of this policy requires:

- Drivers are educated in road transport fatigue management rules and regulations.
- Drivers take statutory rest breaks when required, and that those rest breaks are included in trip planning by schedulers.
- Contractors have documented fatigue management and training strategies in place in their organisations, and that these are maintained.
- Commercial arrangements between Freight Hub Logistics and drivers and contractors NEVER incentivise breaches of fatigue management laws.

**WORK & DRIVER SCHEDULING** - Freight Hub Logistics is committed to the activation and quality management of transport and workplace scheduling strategies that ensure the safety of employees, contactors, and the environment, and the community, through compliance with all CoR legislation, and associated rules and regulations in the Australian Transport Industry. Compliance and enforced management of this policy requires:

- Schedulers and management to ensure loads are allocated in accordance with statutory vehicle mass limits.
- Schedulers and management to ensure driver plans are achievable to the best of their practical experience, and do not contribute to any requirement for drivers to exceed speed limits under any circumstances.
- Schedulers to proactively manage unprogrammed delays and scheduling changes that affect drivers working hours, fatigue, mass limits, and route speed, to ensure that jobs are added or removed from schedules so that there is full compliance to CoR legislation .
- Schedulers to ensure driver fit for duty declarations, and pre trip vehicle checks are completed before the commencement of activity.

**MASS & DIMENSION LIMITS** - Freight Hub Logistics takes all reasonable steps ensure that loads direct from its sites, and external brokered loads comply with axle mass limits, and comply with statutory legislation governing mass limits on Australian roads in all states of Australia. The policy requires that:

- All consignment documentation declares accurate cargo weight and dimensions
- For drivers transporting shipping containers, a container weight (and over-dimensional) declaration is issued to the driver before collection and departure from any Freight Hub or customer site.
- All customers declare accurate cargo weights and dimension on freight bookings placed with Freight Hub Logistics.
- All consignment notes are signed before departure by drivers to ensure they are aware of the mass and dimensions of the cargo load they are undertaking.
- Drivers shall NEVER be pressured to transport a load they do not feel is compliant in mass or dimension.
- All Freight Hub drivers are trained in load restraint, and road mass and dimension limits for Australian Operations.
- Freight Hub weight scales are calibrated and maintained for the calculation of load weights before despatch.
- All contractors can provide evidence of Mass Limit compliance strategies in their business's prior to engagement, including certificates of compliance for in chassis axle weight gauges where fitted.
- All equipment for the restraint of mass limit loads is complaint to Australian standards and free of wear or damage that may compromise is effective purpose of use.
- Transport vehicle routing and scheduling is designed to manage compliance to local road and bridge mass and dimension limitations.

**SPEED LIMIT MANAGEMENT** - Feight Hub Logistics takes all reasonable steps ensure that all its employee and contractor drivers (of any road vehicle) do not breach Australian road speed limits. This Policy requires that:

- Schedulers do not allocate work volumes that are not reasonably achievable in a shift, to ensure drivers are not pressured to breach speed limits.
- Exception reporting technology is deployed where possible on company and contractor vehicles which reports speed limit breeches back to base.
- All contractors can provide evidence of managed CoR policy directly relating to speed limit management.
- It is expected that licenced drivers do not need education on Australian road speed limit compliance, and therefore breaches of speed limits resulting in fines, will be the responsibility of the driver, and if the offense is severe, the driver will be terminated immediately.
- All company and contractor vehicles are fitted where required with functioning speed limiter devices, and records of maintenance of those devices can be provided on request to prove the contractor is operating compliantly.

**LOAD RESTRAINT** – Freight Hub Logistics ensures that all loads undertaken are restrained safely and in accordance with load restraint guidelines, and legislation in all states for Australia. This Policy requires that:

- All loads departing (and arriving) Freight Hub sites are restrained safely
- Generally applied mechanical load restraint should withstand forces of at least:
  - 80% of the unitised weight in the forward direction
  - 50% of the unitised weight in the sideways or rearward direction
  - 20% of its weight vertically.
- The type of load restraint may differ, however where possible Freight Hub will select vehicles and contractors who operate universally preferred load restraint systems such as:
  - Load restraint trailer curtains
  - Roof hung, sliding aluminium gated trailers (centre and side rail mounted)
  - The use of rigid plastic angles and 25000kg rated web strapping over all palletised stock – irrespective of load restraint curtains – unitised freight requires lashing against vertical, forward, rearward, vertical and sideways forces within the vacant space of a loaded trailer.
- All load restraint systems are inspected regularly, and maintained in good order and service records are available.
- Side-loader container lifter chains are tested and re-certified every 12 months to ensure they are free from wear and damage, and safe for their purpose of use.
- All managers involved in transport operations, including drivers, and staff undertaking unloading and out-loading of vehicles from any Freight Hub or Freight Hub customer facility has been trained, and passed a certificate in load restraint provided by an Australian approved training provider.

**BREACHING THE POLICY** – Freight Hub Logistics has set in place a responsible, reasonable, and achievable CoR policy, which aims to care for the safety, lives, and wellbeing, of all of our employees, contractors, and those in the community, and the environment. Compliance to the policy by managers, employees, and contractors is a critical pursuit of the Freight Hub Logistics business. The consequences of non-conformance will result in, but are not limited to:

- Re-education (or education) of employees and contractors for determined knowledge gaps, or unexpected events, or accidental non-conformance.
- Termination of employment for clear breaches of this CoR policy or related legislation.
- Immediate termination of employees or contractors for negligent or deliberate non-conformance to this CoR policy or related legislation.
- Legal action against employees or contractors for severe breaches of this CoR policy or related legislation in any State of Australia, which results in injury, loss of life or cargo, cargo and or property damage, environmental harm, or community disruption.