

## CHAIN of RESPONSIBILITY POLICY

At Intermodal Group our goal is to provide a safe and healthy working environment for all of our employees, contract carriers, and anyone who may be affected by our work.

What is Chain of responsibility?

Chain of Responsibility means that all parties in the road transport supply chain:

- Are responsible for preventing a breach of road transport laws; and
- Must take positive steps to prevent a breach of the road transport mass, dimension, loading, and work hour laws.

### Scope

This Policy applies to all employees and contractors of Intermodal Group, and applies to all Company premises.

### Policy

To ensure compliance with mass and dimension limits, load restraint requirements, driving hours, and other road traffic legal requirements, the Company has implemented systems to ensure:

- Training needs are identified;
- The mass of each vehicle is assessed and recorded, including units operating under Mass Management;
- The correct permits are issued to all pertinent vehicle combinations and any oversize loads;
- All loads are restrained in accordance with the NTC Load Restrain Guide;
- Work practices are in place for vehicle and equipment serviceability and all loads correctly restrained;
- Dangerous Goods are transported in accordance with WA Dangerous Goods Safety Act 2004 and associated Regulations (ADG 7.3);
- Recording of driver activities inclusive of driving, work hours, and fatigue breaks;
- Compliance assurance conditions in relevant commercial arrangements with other responsible persons do not amount to non-compliance.

Intermodal Group will also take adequate measures to ensure participants who are involved in the following operations have the necessary information, instruction, training and supervision to ensure compliance with Chain of Responsibility requirements:

- Consigning - a person or company commissioning the carrying of goods;
- Packing - placing goods in packages, containers or pallets;
- Loading - placing or restraining the load of a vehicle;
- Driving - the physical act of driving a vehicle;
- Operating - operating a business which controls the use of a vehicle;
- Receiving - paying for the goods / taking possession of the load.

## Complying with the law is shared responsibility

Anyone – not just the driver – who participates in Intermodal Group’s operations, has a responsibility to take all reasonable steps to comply with the Chain of Responsibility requirements.

### Chain of Responsibility Flowchart

Everyone involved in the supply chain of delivery by heavy vehicle must take responsibility for how goods are delivered or received, as outlined in the following flowchart:

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<b>Operator</b>	The person who operates or manages the business that is dispatching goods by heavy vehicle must ensure that: <ul style="list-style-type: none"><li>• Driver’s activities, e.g. work and rest times, are recorded and that those records are kept;</li><li>• Rosters are planned to ensure that drivers do not exceed the permitted number of driving hours;</li><li>• Vehicle speed limiters are working;</li><li>• Loads do not exceed dimension or mass limits, and;</li><li>• Loads are properly restrained.</li></ul>
<b>Employer</b>	A person who engages someone to drive a heavy vehicle must take all reasonable steps to ensure that their business practices do not cause the driver to drive: <ul style="list-style-type: none"><li>• In breach of work and rest requirements;</li><li>• In breach of speed limit requirements; or</li><li>• While fatigued.</li></ul>
<b>Scheduler</b>	The person who schedules transportation by heavy vehicle must ensure that the schedule allows the driver to: <ul style="list-style-type: none"><li>• Stay within the speed limit;</li><li>• Keep within the permitted number of driving hours; and</li><li>• Have minimum rest periods.</li></ul>
<b>Loading Manager</b>	The person who loads goods onto a heavy vehicle must ensure that the vehicle’s load: <ul style="list-style-type: none"><li>• Remains within dimension or mass limits; and</li><li>• Is stable and not able to move or fall.</li></ul>
<b>Packer</b>	The person who packs goods into a heavy vehicle must: <ul style="list-style-type: none"><li>• Document the loads and make sure that the documentation is accurate; and</li><li>• Ensure any goods packed in freight containers are within the container’s gross weight or safety approval rating.</li></ul>

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**Dispatcher**

The person who dispatches goods for delivery by heavy vehicle must ensure that the delivery will not require the driver to:

- Inappropriately secure the load;
- Transport goods that exceed vehicle dimension or mass limits;
- Exceed the permitted number of driving hours;
- Fail to have minimum rest periods; or
- Exceed speed limits.

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**Driver**

A driver of a heavy vehicle must:

- Ensure that the vehicle remains within the dimension or mass limits;
- Ensure the load is properly restrained;
- Ensure all required equipment is appropriately fitted to the vehicle;
- Take the required rest break;
- Observe driving hours Regulations and speed limits; and
- Drive safely and responsibly.

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**Receiver**

The person who is responsible for ordering or accepting the delivery by heavy vehicle must ensure that the delivery will not require the driver to:

- Inappropriately secure the load;
  - Transport goods that exceed the vehicle dimension or mass limits;
  - Exceed permitted driving hours;
  - Fail to have minimum rest periods; or
  - Exceed speed limits.
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**Procedures**

This Chain of Responsibility document is an amalgamation of policies and procedures that are associated with the WA Road Traffic Act.

All managers and supervisors will continually monitor and enforce the Chain of Responsibility Policy and associated procedures to ensure that:

- Operating conditions do not require employees to breach Traffic laws in any way; and
- Employees are operating in compliance with the Policy and associated procedures.