

**TRANSPORT CODE OF CONDUCT
FOR REDOX PTY LTD.**

AT

NO. 2 SWETTENHAM ROAD

MINTO NSW 2566



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Table of Contents

| | |
|--|-----------|
| 1.0 Introduction | 1 |
| 1.1 Purpose..... | 1 |
| 1.2 Scope | 1 |
| 1.3 Definitions | 1 |
| 1.4 References..... | 1 |
| 2.0 Operator | 2 |
| 2.1 Operator Requirements and Targets..... | 2 |
| 2.3 Team Contribution..... | 2 |
| 2.4 Operator Training and Development..... | 2 |
| 3.0 Conduct | 3 |
| 3.1 Document Confidentiality | 3 |
| 3.2 Personal Conduct..... | 3 |
| 3.3 Unlawful Instructions | 3 |
| 3.4 Gratuities, Gifts or Benefits | 3 |
| 3.5 Ethics | 3 |
| 4.0 Driving | 4 |
| 4.1 Professional Conduct | 4 |
| 4.2 Workplace Safety | 4 |
| 4.3 Licence..... | 4 |
| 4.6 Passengers | 5 |
| 5.0 General | 5 |
| 5.1 Health..... | 5 |
| 5.2 Appearance..... | 5 |
| 5.3 Prescribed Drugs and Intoxicants | 5 |
| 6.0 Head Office Site | 6 |
| 6.1 Site Access and Activity | 6 |
| 6.2 Heavy Vehicle Movements during Peak Hour and Night Time..... | 6 |
| 7.0 Vehicle Maintenance | 7 |
| 7.1 Inspection..... | 7 |
| 7.2 Equipment..... | 7 |
| 7.3 Security | 7 |
| 7.4 Load Coverage..... | 7 |
| 7.5 Accident | 7 |
| 7.6 Vehicle Noise Emission..... | 8 |
| 8.0 Systems | 8 |
| 8.1 Quality System and Responsible Care..... | 8 |
| 8.2 Non-conformance..... | 8 |
| 8.3 Misconduct | 8 |
| 9.0 Miscellaneous | 9 |
| 9.1 Code Exceptions in Emergency | 9 |
| 9.2 Contract Carrier Owned Vehicles..... | 9 |
| 9.3 Customer / Supplier Owned Vehicles..... | 9 |
| Appendix A – Transport Routes and Vehicle/Driver Requirements | 10 |

1.0 Introduction

1.1 Purpose

As a professional and ethical company, Redox Pty Ltd maintain the confidence of the Australian and New Zealand community through sound expertise, innovation, good decision making skills and due regard for our accountabilities.

The Redox Transport Code of Conduct is a decision making tool for Redox employees, contract carriers, suppliers and customers. The practical application of this Code by companies involved directly or indirectly with Redox will allow ethical and considerate behaviour for the transport of materials.

1.2 Scope

This Code applies to all Redox owned and operated sites per Procedure 0402 – Redox Offices. It applies to contract carriers, suppliers and customers as outlined in principles 9.2 and 9.3.

1.3 Definitions

- Heavy Vehicles: Configuration for all vehicles over 4.5 tonnes Gross Vehicle Mass (GVM).
- Contract Warehouse: non-Redox sites utilised by Redox for storage purposes.
- Head Office site: as detailed in Procedure 0402 – Redox Offices.
- Supplier: Companies that provides Redox with a product or service.
- Contract Carrier: Companies contracted by Redox specifically for the transport of materials.
- Customers: Companies to which Redox supplies products.
- Operator: Truck Driver.
- Problem Record: Redox method of investigating/resolving system issues using a computerised record of the problem and actions taken to investigate and resolve.

1.4 References

- Determination of Development Application: S01-01687 – Consent Conditions issued by NSW Department of Infrastructure, Planning and Natural Resources (DIPNR) September 2003.
- Environmental Impact Statement: Greenfield Development for the Major Storage & Distribution Centre Redox Chemicals Pty Ltd, prepared by Dick Benbow & Associates Pty Ltd, October 2002.
- Procedure 0402 – Redox Offices.
- Load Restrain Guide prepared by the National Transport Commission and the Roads and Traffic Authority of NSW.

2.0 Operator

2.1 Operator Requirements and Targets

The operator must be licensed and competent to drive the assigned vehicle; and must complete adequate work hours and perform duties to the best of their ability.

In performing official duties, operators will:

- Be industrious, and exercise proper care and attention whilst driving.
- Ensure correct documentation is available during transport, particularly where customers or members of the public may rely on the information provided.
- Know and understand the duties of the assigned job as outlined in the job description or contract agreement.
- Fulfil conditions of employment with regard to hours of duty and leave provisions.
- Be thoroughly familiar with any operations manuals, procedures, and guidelines that apply to the area of work, and ensure that these are followed in the performance of duties.
- Only provide advice to co-workers and management that is independent and based on an accurate representation of the facts.
- Seek to be innovative in the continual improvement of Redox Transport Management, and ensure all improvements are discussed with Redox Management.

2.3 Team Contribution

Operators are expected to contribute constructively to the transport management team, by providing a positive attitude towards others and thereby the efficient resolution of problems. Operators should aim for the following for interaction with others:

- Open and helpful relationships, with increased levels of trust and reduced levels of potential frustration and conflict,
- Enhanced levels of service,
- Improved efficiency, effectiveness and productivity,
- Improved communication and flow of information,
- Improved problem solving.

2.4 Operator Training and Development

It is imperative the operator remains licensed and knowledgeable with the current legislation related to the transport of the materials they are carrying. All Redox employees are given practical on the job training and contract carriers / suppliers will be observed in their ability to carry out a task. Where new procedures are introduced, the appropriate training will be provided.

Operators are encouraged to engage in relevant learning opportunities to develop the skills and knowledge necessary to perform their job and to enhance the delivery of services.

3.0 Conduct

3.1 Document Confidentiality

Operators are required to carry documentation with necessary information for the transport of materials; this information will be treated as confidential and will not be disclosed to unauthorised persons.

Where it has been proven, wilful misuse and blatant abuse of such information has occurred, Redox may decide to terminate employment or disengage services. In serious cases, breach of implied terms of employment or contract agreement may lead to prosecution.

3.2 Personal Conduct

Operators are not to:

- Intentionally behave in a manner aimed at physically injuring or assaulting a person, leading to actual physical or psychological harm,
- Verbally abuse, including swear, insult, or use condescending language,
- Use aggressive body language indicating intimidation, contempt or disdain,
- Harass, including bullying, racial or sexual harassment,
- Express either verbally or in writing, threatening behaviour with an intention to cause harm.

3.3 Unlawful Instructions

Operators will not act unlawfully. Instructions provided by Redox will not pressure an operator into breaking the law or jeopardising their life or the lives of others; if such a case were to occur the operator must immediately report the circumstance to the Human Resources Manager.

3.4 Gratuities, Gifts or Benefits

Operators will not seek gratuities, gifts or benefits from customers, suppliers or other contract carriers in return for improved service for the other party. Redox expects that no operator will put themselves into a situation that will compromise work ethic; such behaviour may result in termination of employment or contract agreement.

The acceptance of corporate gifts or gifts in festive seasons, provided these are not in return for improved services are authorised at the discretion of Redox Management.

3.5 Ethics

Operators are expected to act in an ethical manner in order to provide excellent customer service; examples of ethical behaviour include but are not limited to the following:

- Act in an honest and truthful manner,
- Treat other individuals fairly and with respect,

- Be accountable for actions taken and avoid financial burden or other obligation to outside individuals or organisations that might influence the performance of official duties,
- Comply with this code and the procedures underlying its provisions as condition of employment or contract agreement.

4.0 Driving

4.1 Professional Conduct

Operators will maintain a high level of professional conduct and respect for other road users, the following are examples that should be exercised at all times:

- Avoid use of engine brakes in residential areas,
- Use the horn as a warning device only,
- Drive defensively and with care to avoid accidents and sudden stops, i.e. allow sufficient room between vehicles and consider weight of load,
- Adhere to posted speed limits and road signs,
- Obey directions of Police, Road and Traffic Authority (RTA) and other authorities,
- Respect and be watchful for pedestrians,
- Do not crowd other operators or traffic, and allow irate drivers the right of way,
- Acknowledge courteous acts by others.

4.2 Workplace Safety

Operators have a duty to apply safe work practices for both personal safety and the safety of others. Under no circumstances is the operator to endanger or jeopardise the life of another for the sake of being time efficient or for any other reason. Operators must inform Redox of any unsafe work practices, near misses or incidents/injuries and cooperate in any investigation carried out by Redox or authorities.

In the event of an injury resulting in medical attention, the operator should notify Redox as soon as possible of the advice provided by the Medical Professional.

Redox has in place an active Safety Management System (SMS) and all employees, contract carriers, suppliers, customers and the community are invited to become active in the SMS for the purpose of making Redox a safer workplace.

4.3 Licence

Operators must have the appropriate Driving and Dangerous Goods Transport Licences for the assignment they have been given. Licences must be renewed prior to the expiry date and shall be available to Redox management and Authorities at all times.

Where a licence has been cancelled the Operator is to inform Redox of the situation immediately, failure to do so may result in termination of employment or contract agreement.

4.6 Passengers

Operators are not permitted to carry passengers without written permission given by Redox management; the passage of hitchhikers will not be tolerated. The only exception is when rendering aid during an accident or other emergency.

5.0 General

5.1 Health

Operators should not under any circumstance attempt to drive a heavy vehicle if they feel sick, dizzy or nauseous; these symptoms can impair an operator's ability to drive. Operators suffering from any medical condition that can impair their ability to drive must advise Redox immediately. Driving duties will be ceased until Redox management agree they can be reconvened, or in serious cases where medical advice has been obtained.

Good house keeping is required in all Redox work areas, including vehicles and lunch room facilities. Smoking is not permitted inside buildings, offices, vehicles or warehouses; designated areas have been allocated for smokers along with ashtrays for disposal.

Operators shall maintain a satisfactory level of physical fitness and general health. Redox encourages all employees and contractors to follow a nutritional diet and exercise regularly.

5.2 Appearance

Operators are required to wear safe work attire in the form of a fluorescent safety shirt or vest that ensures they are visible to other individuals when working around the vehicle. The work attire is to be maintained in a neat and tidy manner when on duty; personal appearance should be clean and presentable. As required the operator will don safety boots, chemical resistant gloves, earmuffs, safety glasses etc.

5.3 Prescribed Drugs and Intoxicants

It is the operator's responsibility to confirm with the doctor prescribing the drug to ensure there are no detrimental effects likely to occur whilst driving. Any person found under the influence of intoxicating liquor or drugs will not be permitted to commence their assigned duties. Consumption of alcohol or drugs is not permitted whilst on duty.

6.0 Head Office Site

6.1 Site Access and Activity

All passenger and heavy vehicles are permitted on site with proper consent. There is no restriction to the type of heavy vehicle allowed to enter other than the entry point and purpose of entry as defined below:

| <u>Access Road</u> | <u>Light Vehicle</u> | <u>Heavy Vehicle</u> |
|--------------------|---|----------------------|
| Swettenham Road | Director's car or visitor in car, courier van, ute. | No access |
| Holmes Road | All | All |

The only recognized business needs for driving on site include:

- Delivery or despatch of product (support documentation must be provided).
- Prior appointment made with Redox employee for visit or repairs (escort will be required).

Drive-in passes will be issued for a specific length of time matching the business need for on-site access.

Off-street parking is not allowed at this site, all vehicles must park on site to avoid traffic congestion; non-employee vehicles may remain on-site only during active use for business. Where car parking has been allocated, Redox requests that operators exercise care and courtesy towards all other users.

The speed limit within the site is not to exceed 8 kph, unless otherwise posted; infringements will be treated as a serious breach of the rules.

Operators of heavy vehicles or vehicles carrying dangerous goods will observe the transport routes and vehicle/driver requirements outlined in Appendix 1 of this document, when transporting material to and/or from the Head Office site. The transport routes provide access to industrial areas whilst minimising the impact of increased traffic in residential areas. Operators found to be ignoring these routes will be issued with a non-conformance by Redox management.

6.2 Heavy Vehicle Movements during Peak Hour and Night Time

The majority of heavy vehicle movements occur outside of peak hour traffic intervals, however where possible Redox, Contract Carriers, Supplier and Customers will avoid arranging delivery or pick up during the hours of 8:00 am to 9:00 am and 5:00 pm to 6:00 pm.

Night time heavy vehicle movements will be on a needs only basis.

7.0 Vehicle Maintenance

7.1 Inspection

Heavy vehicles owned by Redox will be inspected internally twice per year to ensure safety and vehicle reliability in accordance with the following criteria:

- cleanliness
- damages
- registration
- licences
- Emergency Procedure Guide (EPG) and Placard Holders
- Log book entries
- General condition
- Additional equipment (fire extinguisher)
- Foreign materials

7.2 Equipment

Depending on the vehicle and load requested for delivery/pick up, the operator is required to ensure the equipment necessary to stow and secure the load in accordance with the Load Restraint Guide are available.

7.3 Security

Operators are to ensure that vehicles are properly secured when left unattended. Whether on company premises, customer premises or elsewhere the responsibility of securing the vehicle is paramount.

7.4 Load Coverage

Redox is in the business of storage and distribution of packaged materials; as such load covers will not be required unless it is for the protection of material from adverse weather conditions. Operators are required to ensure load covers are available to protect every load from rain, hail or snow.

All load covers are to be inspected by the operator before use. All vehicles wanting to pick-up or deliver a load during adverse weather will give permission to Redox to freely inspect the load cover if deemed necessary. If any covers are deemed incompetent then the load will not be allowed to move until a competent cover is found, purchased or repaired.

7.5 Accident

In the event of an accident it is the operator's responsibility to obtain the details of those involved i.e. name(s), address(s), vehicle registration and type, time, date, location, injuries if known, and any relevant points relating to the accident. The police must be notified if required.

The Operator should not sign written statements by any person until Redox has been fully informed of the details; this action should be done promptly after the accident. The operator, if prohibited by injuries, should ensure family or a personal representative is provided with the details who can in turn notify Redox.

7.6 Vehicle Noise Emission

Vehicle noise includes noise from exhaust systems, horns, brakes, engine and sound systems. To combat the emissions of noise the following must be observed;

- Operators will not use engine brakes in residential areas or the horn will only be used as a warning device,
- Australian Road Rule 291 requires that vehicles do not emit 'unnecessary noise' such as noise from intentional wheel spins and doughnuts,
- Operators must comply with notices issued following noise checks on heavy vehicles at heavy vehicle inspection stations.
- Complaints registered with Redox regarding noise emission will be logged and investigated in accordance with company procedures.

8.0 Systems

8.1 Quality System and Responsible Care

Redox maintains a certified ISO 9002 Quality Management System that documents procedures used by the company to operate its services. These procedures determine the level of service Redox intend to maintain to meet legislative and customer requirements, whilst at the same time allow identification of where improvements can be made. Redox is a participant of the Plastics and Chemicals Industries Association (PACIA) Responsible Care Program and strives towards continual improvement with the Industry Best Codes of Practice.

Procedures are available to all operators to use as a reference to how job activities are to be performed and indicate where safety requirements have to be met.

8.2 Non-conformance

In the event an operator refuses or is seen wilfully breaching this Code then a non-conformance will be issued through a Problem Record; if the operator will not change their behaviour then termination of employment or services may take effect.

8.3 Misconduct

Repeated offences relating to infringements of the Company rules, general driving safety requirements, tampering with vehicle equipment and/or customer complaint regarding the services provided will result in disciplinary action being taken and may cause termination of employment or services.

9.0 Miscellaneous

9.1 Code Exceptions in Emergency

In an emergency situation, such as fire, injury, chemical spill, bomb threat etc. it may be necessary because of immediate danger to life to act in a manner contrary to this Code. Only a member of Redox management may authorise personnel to undertake such necessary actions. Code exceptions are granted for Emergency Services, i.e. Police, Ambulance, Fire Brigade.

9.2 Contract Carrier Owned Vehicles

All contractor carriers are to abide by this Code as a part of their "Terms of Agreement" with Redox. In fully maintaining their services to Redox their knowledge of this Code is understood and adhered to; any breach could mean the suspense of services.

In the event where a contract carrier has breached part of the Code, the following course of action will take place;

- The contract carrier will be notified immediately of the breach.
- The intended service in breach will be suspended until the Code is respected.
- A Problem Record will be opened to investigate the breach. This investigation will examine the cause of the breach with a view to resolve the issue and prevent reoccurrence.
- If it is found that the breach was deliberate then at the discretion of Redox the services of that contract carrier could be completely removed.
- If the breach was accidental then the offender will be noted in a Problem Record and the course of action corrected. However, if the breach becomes regular then the offender's services will be completely removed.

9.3 Customer / Supplier Owned Vehicles

This Code is available to all Customers and Suppliers at www.redox.com. If Customers or Suppliers require access to Redox sites or if they are picking-up/delivering to a Contract Warehouse; Redox expects their respect concerning this code. The intended parties would follow and implement these measures when conducting themselves in or out of Redox sites. Redox will educate its customers/suppliers and ask them to train their personnel to follow this code.

Where a breach has occurred then the following will take place;

- The Redox representative that is the Account Manager or Product Manager will notify the customer/supplier of the breach.
- A Problem Record will be raised to determine the cause and the customer/supplier will be educated to the correct processes.
- Any assistance or training that could be offered to correct the breach from occurring again will be presented depending on the situation.
- A resolution will be set so that any future breaches will not be repeated.

Appendix A – Transport Routes and Vehicle/Driver Requirements

All vehicles with a configuration of 4.5 tonne Gross Vehicle Mass (GVM) or any vehicle carrying Dangerous Goods greater than "Small Quantities" as per the definition in section 1.10 of the *Commonwealth Road Transport Reform (Dangerous Goods) Regulations*; are required to use the following designated routes when transporting materials to and/or from Redox Pty Ltd. No. 4 Holmes Road, Minto NSW 2566.

In addition, all heavy vehicles transporting materials to and/or from the site will:

- a. Have registration with an applicable Road Authority, and
- b. Have preventative and ongoing maintenance programs of the vehicles, and
- c. If transporting bulk Dangerous Goods, be licensed to transport these in the applicable jurisdictions of travel.

All heavy vehicle drivers transporting materials to and/or from the site will:

- d. Not use engine brakes on roads bordering residential areas, and
- e. Avoid the use of vehicle horns whilst on the site, and
- f. If transporting bulk Dangerous Goods, be licensed to transport these in the applicable jurisdictions of travel and will adhere to Dangerous Goods Legislation, and
- g. Access and depart the site in a forward direction via the Holmes Road entrance.

| From the South | From the North |
|--|---|
| <ul style="list-style-type: none"> • Hume Highway (F5 Freeway); • Narellan Road exit and east for 1.6 km; • North east into Blaxland Road for 2.6 km; • North into Campbelltown Road for 950 m; • East into Rose Payten Drive for 200 m; • North into Airds Road for 2.5 km; • West into Ben Lomond Road for 300 m; and • South into Holmes Road to the site. <p>Outbound vehicles would use the same route in the opposite direction.</p> | <ul style="list-style-type: none"> • Hume Highway (F5 Freeway); • Campbelltown Road exit south of Raby Road overpass and south for 1.4 km; • East into Rose Payten Drive for 200 m; • North into Airds Road for 2.5 km; • West into Ben Lomond Road for 300 m; and • South into Holmes Road to the Site. <p>Outbound vehicles would use the same route in the opposite direction.</p> |
| Ingleburn Industrial Estate (Limited) | |
| <p>Only vehicles that are delivering or picking up materials in the Ingleburn Industrial Estate after leaving the Redox site are permitted to use the following route.</p> <ul style="list-style-type: none"> • Exit site into Holmes Road; • Turn west into Ben Lomond Road for 300 m; • Turn north into Campbelltown Road for 2.2 km; and • Turn into Williamson Road to the Ingleburn Industrial Estate. <p>Southbound vehicles leaving would use the same route in the opposite direction, or alternately, if travelling north to the Sydney Metropolitan Region, would use the Brooks Road ramps to access the Hume Highway (F5 Freeway). Only rigid heavy vehicles carrying 12 pallets or less will be permitted to travel to the Ingleburn Industrial Estate.</p> | |
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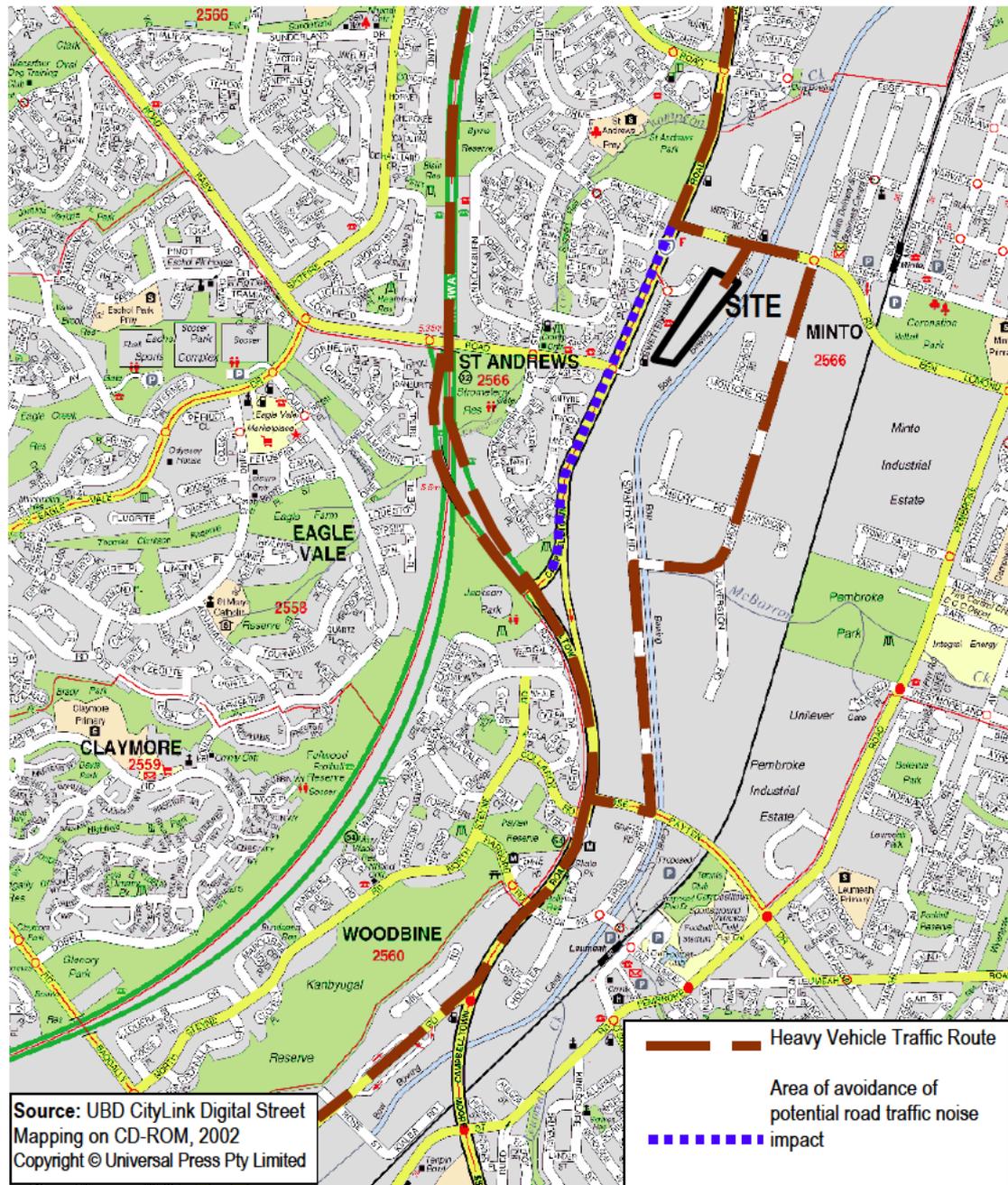


Figure care of Dick Benbow & Associates, Figure 4-41 EIS, 2002.