



Chain of Responsibility (CoR) Policy

Engineering Building & Infrastructure (PDY Ltd) is committed to the health and safety of our workforce and the public. This policy provides a framework to ensure our company and all parties in our operations comply with Australia's Heavy Vehicle National Law (HVNL) Chain of Responsibility obligations. Under CoR laws, **every** party involved in a heavy vehicle transport task – from the people who plan and schedule deliveries to those who load, drive, or manage vehicles – has a legal duty to take all reasonably practicable steps to prevent safety breaches and violations of road transport laws. Engineering Building & Infrastructure will not knowingly require any employee or contractor to do anything unlawful or create a dangerous situation. Our goal is to ensure that no link in the transport “chain” pushes risk onto another; instead we will build systems and practices so that all transport activities (loading, scheduling, driving, etc.) are conducted safely and legally.

Chain of Responsibility Overview

The HVNL establishes a *primary duty* for anyone who has control or influence over heavy vehicle operations to ensure safety. As one industry guide explains, CoR “makes it clear that everyone in the supply chain has a part to play in keeping roads safe”. In practice, this means **no single party (e.g. the driver) can carry the entire burden**; instead each link must take reasonable steps to prevent breaches. For example, if a truck is overloaded or a driver is fatigued, liability can extend beyond the driver to those who scheduled, loaded, or approved the transport. All CoR parties must identify and manage the risks arising from their transport activities (for instance by *identifying hazards, implementing controls, and monitoring their effectiveness*). In short, CoR is about **shared accountability**: every person who influences a heavy vehicle journey has a duty to ensure it is done safely.

The diagram above highlights typical parties in the heavy-vehicle transport chain. CoR law applies to **all** such parties – including drivers, operators (carriers), schedulers, consignors (senders) and consignees (receivers), loaders/packers/unloaders, contractors, and even company executives and officers. For example, schedulers must set realistic delivery timetables, loaders must secure cargo properly, and executives must ensure the business has adequate safety systems. Each of these parties “carries a primary duty to guarantee safety” in their area, and **no one can contract out of this responsibility**. In other words, everyone from project managers to drivers must act to prevent breaches (such as overloading, speeding, or fatigued driving) – ignorance is not an excuse.

Roles and Responsibilities

The CoR law explicitly lists functions that make a party “in the chain of responsibility,” regardless of job title. Key roles include:

- **Executive Officers/Managers:** Must exercise *due diligence* – ensuring the company has effective safety policies and systems for heavy vehicle operations. This means setting a safety-first culture,

allocating resources, and reviewing risk controls. Executives can be held liable if corporate governance fails to prevent breaches.

- **Operators/Employers:** (e.g. transport managers or employers of drivers) must ensure vehicles are roadworthy (maintenance, speed limiters, etc.), drivers are trained and fit for duty, and schedules do not force illegal driving hours or speeds.
- **Schedulers/Planners:** Must prepare delivery schedules and work rosters that allow compliance with speed limits and driving-hour regulations. Reasonable scheduling (including contingency time for traffic or delays) is required so drivers are not pressured to speed or skip rest breaks.
- **Consignors/Consignees (Senders/Receivers):** Must accurately describe loads (including weight and dimensions), ensure goods are safely packaged, and cooperate on load planning. They must ensure that delivery instructions *do not* require or encourage drivers to break the law (e.g. by demanding excessive speed or overtime).
- **Loaders/Packers/Unloading Managers:** Must ensure cargo is loaded so it does not cause the vehicle to exceed mass or dimension limits and is secured according to the approved load restraint standards. They should coordinate with drivers/transporters to manage loading times and avoid delays, and must promptly notify drivers if delays (e.g. over 30 minutes) occur.
- **Drivers:** Must conduct vehicle checks, keep accurate logbooks/work diaries, obey road rules, and comply with fatigue-management requirements. Drivers must ensure loads are properly restrained and vehicle loads do not exceed legal limits. They must report any factors that prevent compliance (e.g. unforeseen delays or mechanical issues) back to their supervisors.

Each of these parties has an active *duty of care* under CoR. As one guide notes, if a heavy vehicle breaches a law, “all those in the chain... can be held accountable... and will be required to show they have taken Reasonable Steps to ensure the driver did not breach road law”. In summary, **every person who can influence a heavy vehicle operation must take responsibility** for safety – from the loading dock to the boardroom.

Policy Requirements and Compliance Measures

To meet these obligations, Engineering Building & Infrastructure will implement the following measures and controls throughout our operations:

- **Contractual Terms:** All contracts, purchase orders, or delivery agreements will be reviewed to ensure they do not contain terms that could breach the HVNL. We will only enter agreements that enable legal transport practices. For example, we will not include clauses that indirectly demand excessive driver speeds or hours, and we will verify that carriers’ consignment documentation meets legal requirements (such as weight declarations). We “will not take any action that could influence drivers... to breach the HVNL,” for instance by offering incentives for early delivery or

imposing penalties for delays.

- **Scheduling & Planning:** Project schedules will include adequate contingency times so that delivery deadlines are realistic. Schedulers will consult with drivers/operators when finalizing schedules, account for expected travel speeds, traffic conditions, and rest requirements. We will avoid any timetable that effectively forces a driver to speed, skip rest breaks, or overload to meet an unrealistic deadline.
- **Load and Cargo Management:** All loads planned by our company will be checked to ensure they do not exceed the vehicle's mass or dimension limits. We will enforce the National Load Restraint Standard: cargo must be secured so it cannot move or fall off the vehicle. Before a journey, we will verify weight information – especially for shipping containers – and ensure any container carried on our behalf has a valid container weight declaration. Load documentation (weight, dimensions, nature of goods) will be accurate and provided in advance to drivers and carriers.
- **Vehicle and Equipment Safety:** We will ensure that any heavy vehicles used in our work (whether owned or contracted) are suitable for the load, maintained in safe condition, and fitted with required safety equipment (brakes, lights, and for regulated heavy vehicles, speed limiters). Records of maintenance, inspections, and repairs will be kept. We will require carriers to demonstrate compliance with vehicle inspection schedules and maintenance standards, reinforcing the shared duty to keep vehicles roadworthy¹.
- **Driver and Contractor Management:** We will only engage drivers and contractors who hold appropriate licenses, are medically fit for duty, and have been trained in relevant safety procedures (including fatigue management and CoR awareness). All parties must comply with legal work/rest limits; we will not allow any schedule or reward structure that encourages drivers to exceed regulated driving hours or to drive while impaired by fatigue. Likewise, company policies will forbid any pressure on drivers to exceed speed limits. We will maintain accurate work diaries or logs as required by law and encourage drivers to report any issues affecting safety or compliance.
- **Risk Management and Consultation:** We will identify CoR-related hazards in our transport activities (e.g. overloading, tight schedules, fatigue) and implement controls to mitigate them, following the basic risk-management steps of **identify, assess, control, and monitor**. This includes developing contingency plans for delays or breakdowns, and regularly reviewing our processes. We will also actively engage with others in the supply chain (e.g. subcontractors, consignors, carriers) to discuss CoR risks and solutions. For instance, we will request information about our transport partners' safety and compliance systems (vehicle checks, fatigue plans, load management procedures) and ensure they align with our standards.
- **Safety Management System (SMS):** Although the HVNL does not mandate a formal SMS, we recognize that having documented policies and procedures is best practice. We will integrate CoR compliance into our overall SMS or similar safety framework, with clear policies, training, and record-keeping. This systematic approach helps ensure we meet our primary duty continuously

and provides evidence of “reasonable steps” taken to prevent breaches.

Enforcement and Accountability

Engineering Building & Infrastructure takes CoR obligations seriously. All employees, contractors, and managers are required to follow this policy and all applicable transport laws. We will enforce compliance through supervision, training, and review. Any violation of CoR laws or this policy – such as knowingly pushing a driver to speed or carrying an overloaded load – may result in disciplinary action up to and including termination of employment or contracts, as it would violate both legal duties and our company standards. As stated in official policy guidance, we will not “knowingly ask or expect” anyone to do anything unlawful or dangerous.

Managers and executives have a particular duty to monitor CoR compliance (“executive due diligence”) by ensuring our policies are followed and by responding promptly to any safety concerns. All parties should promptly report any incidents, hazards, or near-misses related to heavy vehicle transport. We will investigate such reports and take corrective action. By embedding safety into every decision, from planning to delivery, we honor the spirit of CoR: making safety everyone’s responsibility.

This policy will be reviewed at least annually or whenever there is a significant change in our operations or legal requirements. Any updates will be approved by the Board. The next review date 11/07/2026.