



Bega Cheese Limited (Bega) is an Australian dairy and food company that recognises the need to observe a high standard of corporate practice and business conduct in our interactions and impact with our employees, customers, suppliers, business partners and in the communities in which we operate.

Chain of Responsibility (CoR) legislation and requirements are set out in the Heavy Vehicle National Law which is administered by the National Heavy Vehicle Regulator. The aim of the legislation is to make sure all parties in the supply chain have responsibility for ensuring breaches of the law do not occur.

Our Commitments

Bega will comply with Chain of Responsibility legislation and the Heavy Vehicle National Law (HVNL).

To support compliance, Bega will implement and maintain an effective Chain of Responsibility Policy. We will do all that is reasonably practicable to prevent breaches of the HVNL in the areas of mass, dimension, load restraint, speed, fatigue and vehicle standards (and maintenance). Bega will ensure our team members are trained, and behave in such a way, that their actions, inactions or demands do not cause or contribute to a breach of the HVNL.

Bega will achieve this by maintaining a Chain of Responsibility Management System.

Scope

This policy applies in Australia to all Bega employees and Bega joint ventures where Bega has operational control and/or have influence over how goods are delivered or received within the Bega supply chain. This policy also applies to our suppliers and third-party logistics providers, as well as contractors to Bega sites.

We care about our people and the communities in which we operate, and to ensure these standards are maintained, there are a range of potential disciplinary outcomes which may be considered if an investigation identifies any breaches of this policy. These outcomes include, but are not limited to termination of employment, and/or termination of 3rd party contracts. Further, breaches may involve referral to the National Heavy Vehicle Regulator or its partner agencies for investigation.

Requirements

Our Chain of Responsibility Policy sets the minimum standard required to be met as a supplier of services to Bega. We require our suppliers to adopt a similar approach in dealing with their own suppliers and sub-contractors.

Bega will:

1. implement this Chain of Responsibility Policy and the supporting Bega Chain of Responsibility Management System;
2. provide training and assessment programs for employees and contractors;
3. ensure the responsibilities of this policy are understood by the Bega Executive Team, and those with responsibility for activities that affect compliance with the HVNL understand their CoR responsibilities;
4. communicate to our suppliers the requirements of this policy and the expectation to comply;
5. ensure all CoR breach incidents and near misses are reported, recorded, investigated (and controls implemented), and escalated as required;

6. ensure Bega suppliers will comply with this policy, monitor compliance, and immediately report any breaches of Chain of Responsibility legislation and this policy to Bega should it occur;
7. audit third party logistics providers engaged by Bega, to ensure they have adequate systems in place to meet both Bega`s commitment to safety, and compliance with the HVNL CoR provisions;
8. monitor regulatory changes, court decisions or other issues impacting the Bega Chain of Responsibility Policy to ensure it remains relevant; and
9. continually work with our suppliers across the Bega supply chain to implement and sustain the requirements of this policy.

Commitment to this policy ensures that everyone involved in organising or carrying out a road transport activity is accountable for the reduction of risk and improved safety performance of the Bega supply chain.



Paul van Heerwaarden
Chief Executive Officer
Bega Cheese Limited



Antonietta Timms
Executive General Manager,
Operational Excellence
Bega Cheese Limited