

	<h2 style="color: red;">Chain of Responsibility Policy</h2>	<p>Version 1.0 Issued: May 2022</p>
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Description:

At Coca-Cola Europacific Partners (CCEP) Australia, we are passionate about our role in improving the safe operation of heavy vehicles on our roads and at our sites, which aligns with our belief that no task is so important that it cannot be done safely.

We will work to eliminate or otherwise minimise the risks associated with our heavy vehicle transport activities to:

- reduce the risk and occurrence of accidents;
- prevent injuries to our people and partners; and
- protect the health and safety of the public.

This Policy shall apply in Australia as a Geographical Policy. Although the Heavy Vehicle National Law does not apply in Western Australia or the Northern Territory, the principles of these laws are to be applied alongside compliance with this Policy and the requirements of local legislation in those jurisdictions.

Key points:

- All parties in the supply chain, including CCEP Australia and its employees, must take reasonably practicable steps to ensure that any risks associated with our transport activities are identified, and are either eliminated or controlled and minimised.
- We must not enter into commercial arrangements (whether in a contract or otherwise) that encourages or incentivises any person (including any driver, transport operator or other supply chain partner) to break the law in connection with the “Chain of Responsibility”.
- We will lead and support a culture of safe transport behaviours and practices through the promotion of heavy vehicle safety within relevant industry bodies, government agencies, business partners and community groups.
- If any person becomes aware of any activity, situation, or behaviour that concerns them or that may be in breach of this Policy, they should act without delay to prevent the activity, situation, or behaviour from continuing or reoccurring, provided (at all times) that it is safe to do so. The person must also report the activity, situation, or behaviour to their manager or a member of the CCEP Australia management team for further investigation.

Non-compliance with our policies and policy guidance could lead to disciplinary action up to and including instant dismissal where appropriate.

Responsible Owner:

Director Supply Chain – CCEP Australia

Further information:

See the full policy guidance, which is attached to this document.

POLICY GUIDANCE – CHAIN OF RESPONSIBILITY POLICY

Coca-Cola Europacific Partners Australia

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1. Policy details and guidance

1.1. Purpose and Scope

The purpose of this Policy Guidance is to describe the standards, criteria and responsibilities relating to the elimination and minimisation of risks associated with the use of heavy vehicles in our transport activities. These transport activities include the movement of raw materials, finished goods, equipment and machinery.

This Policy shall apply in Australia as a Geographical Policy.

This Policy is designed to form part of CCEP Australia's safety and compliance strategy. It applies to all employees (whether full time, part time or casual), contractors and suppliers of CCEP Australia in Australia, and any visitors to CCEP Australia sites, that have responsibility for, or involvement in, activities that fall within the scope of road transport laws. These activities may include (but are limited to) transportation, warehousing, dispatching, ordering or receiving goods, and support roles associated with these activities.

This Policy applies to all CCEP Australia workplaces, and any other sites or situations where employees, contractors or suppliers (or their employees or contractors) may be representing, or working for or on behalf of, CCEP Australia.

If you are uncertain if this Policy applies to you, please speak with your manager, People & Culture representative or contractor site liaison.

1.2. Chain of Responsibility

1.2.1. Introduction

Chain of Responsibility (also known as "CoR") is used to describe the nationally legislated program of compliance and enforcement in the road transport industry.

The Chain of Responsibility extends legal liability for certain road law offences to all parties in the supply chain who, by their actions, inactions or demands, may exercise control or influence over a transport-related activity.

All parties involved in the road transportation of goods (including those involved in transportation, warehousing, ordering, dispatch and receipt of goods) fall within the Chain of Responsibility, with each party able to be held to account for their actions, inactions, influence or control. The extent to which a party may be held to account depends on the role they play in the Chain of Responsibility. The Chain of Responsibility also extends to parties that have roles outside the perceived boundaries of the transport industry, such as manufacturers, bottlers and suppliers.

1.2.2. Heavy Vehicle National Law

The Heavy Vehicle National Law (**HVNL**) is the backbone of the Chain of Responsibility. First coming into effect in 2014, the HVNL was established to provide nationally consistent laws for operating "heavy vehicles" (being vehicles with a gross mass of over 4.5 tonnes).

The objects of the HVNL are to:

- promote public safety;
- manage the impact of heavy vehicles on the environment, roads and public amenity;
- promote industry productivity and efficiency in the road transport of goods; and
- encourage and promote productive, efficient, innovative and safe business practices.

The HVNL applies a general safety duty to all parties within the supply chain to ensure the safety of their transport activities. This primary duty represents an obligation on those participants in the supply chain to eliminate or minimise potential harm or risk by doing all that is reasonably practicable to ensure safety across six “Core Risk Areas”, which are:

- Speed Compliance;
- Driver Fatigue Management;
- Vehicle Mass;
- Vehicle Dimension;
- Vehicle Loading; and
- Vehicle Standards.

The scope of the HVNL includes the following roles within a supply chain:

- any operator of a heavy vehicle;
- if the driver of a heavy vehicle is:
 - an employed driver, the employer of the driver; and
 - a self-employed driver, the prime contractor for the driver;
- any scheduler of a heavy vehicle; and
- in respect of any goods in a heavy vehicle, the following persons connected to the goods:
 - any consignor;
 - any consignee;
 - any packer;
 - any loading manager;
 - any loader; and
 - any unloader.

Although the Heavy Vehicle National Law does not apply in Western Australia or the Northern Territory, CCEP Australia expects the principles of the HVNL to be applied alongside compliance with this Policy and the requirements of local legislation in those jurisdictions.

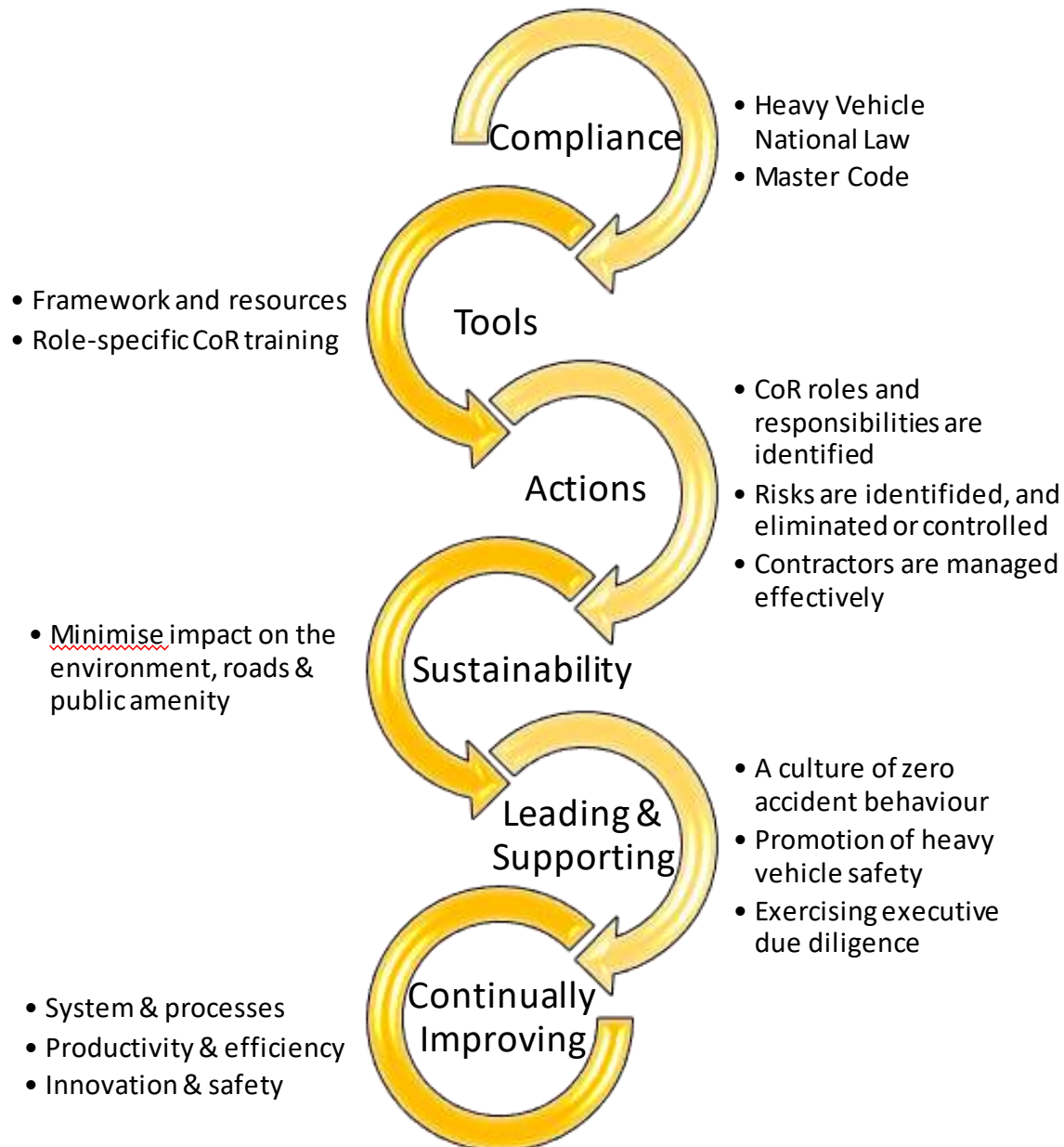
1.2.3. Industry Master Code of Practice

The Industry Master Code of Practice (**Master Code**) also applies to all parties in the supply chain and was developed by the industry to provide practical guidance on managing risks associated with transport activities. Compliance with the Master Code can be used to demonstrate compliance with the HVNL.

In November 2018, the Master Code was registered with the National Heavy Vehicle Regulator, which is a statutory authority established pursuant to the HVNL for the purposes of regulating all heavy vehicles in Australia.

1.3. Managing Chain of Responsibility

1.3.1. Framework, resources and training



1.3.2. Roles and responsibilities

Roles and responsibilities in the Chain of Responsibility for our transport activities will be identified in consultation with our supply chain partners. This will identify the roles in our transport activities that have influence or control over the safety of the transport activities and define what they are required to do.

It is important to remember that more than one role can have influence or control at the same time, and that the same roles can also be held by more than one person.

Managers are required to review and complete the “Supply Chain Road Map & CoR Roles Responsibility” document, which can be accessed through CCEP Australia’s Health & Safety Management Framework.

CCEP Australia will:

- not knowingly ask or expect any employee or contractor to do anything that is unlawful or that will create a dangerous or potentially dangerous situation;
- identify its transport activities and the parties (both within the business and externally) who influence or control the safety of its transport activities;
- identify the roles and functions assigned to all persons involved in its transport activities, including executives, managers, employees, contractors and external parties in the Chain of Responsibility, and will put in place processes to assist those persons to understand their responsibilities;
- identify, mitigate and manage risks associated with its road transport activities in line with CCEP Australia’s Risk Management Policy;
- partner with reputable transport suppliers in alignment with CCEP Australia’s Procurement Policy; and
- work with relevant industry bodies, government agencies, business partners, community groups and other relevant organisations to promote transport safety behaviours and practices, as they relate to CCEP Australia’s transport activities.

Management will take steps to ensure CCEP Australia meets its safety obligations through leading and supporting a culture of zero accident behavior (see section 1.3.6. below).

1.3.3. Risk management

Risk management processes will be used to take reasonably practicable steps to identify, eliminate or control the risks across the six “Core Risks Areas”. This is to prevent accidents and injuries to our employees or partners and to protect the health and safety of the public.

Managers are required to review and complete the “CoR Risk Assessment Control Sheet”, which can be accessed through CCEP Australia’s Health & Safety Management Framework, for their area of responsibility within our operations.

1.3.4. Contractor management

CCEP Australia operates ethically at all times, and it expects the suppliers and contractors it engages (and their employees and contractors) to do the same.

Before a third-party operator is engaged, reasonable enquiries must be made into their policies, processes and practices. Evidence of robust operational controls across the six “Core Risk Areas” are required, in addition to compliance with CCEP Australia’s health, safety and environmental policies (including CCEP Australia’s Drug and Alcohol Policy).

If a third party doesn’t meet CCEP Australia’s required standards, they should not be engaged

to perform work for or on behalf of CCEP Australia.

CCEP Australia's commercial arrangements must not encourage or incentivise a driver, transport operator or other transport chain partner to break the law (for example, by driving for excessive hours or speeding to meet deadlines.)

CCEP Australia must not enter into a contract or other arrangement with the driver of a heavy vehicle (or with any party in the Chain of Responsibility for a heavy vehicle) that CCEP Australia knows, or ought reasonably to know, would encourage or provide an incentive for the driver of the vehicle (or a party in the Chain of Responsibility for that vehicle) to breach Chain of Responsibility legislation.

1.3.5. Sustainability

We undertake our transport activities with a view to minimising the impact of heavy vehicles on the environment, roads and public amenity. CCEP Australia will do this by specifying suitable vehicle standards, reviewing our routing and supply chain networks, and by innovating and investigating new technologies that reduce the effects of our transportation activities on the environment.

1.3.6. Leading and supporting

CCEP continues to push for a culture of zero accident behaviour, which incorporates safe transport behaviours and practices that:

- encourage hazard and incident reporting;
- allow us to learn from pre-and post-incident analyses; and
- promote the implementation of controls that are suitable for our business activities.

This culture will be instilled by business leaders, following safety leadership principles and programs. Leaders will not knowingly ask or expect any employee or contractor to do anything that is unlawful or that will create a dangerous or potentially dangerous situation.

CCEP Australia management will exercise due diligence to ensure that the transport activities in our business are safe by:

- understanding their duties and the operations of CCEP Australia's business, including hazards and risks;
- keeping up to date with safety developments and changes;
- monitoring safety performance of CCEP Australia;
- receiving and responding to reports of incidents, hazards, risks and non-compliance; and
- verifying that resources and processes to manage risks are provided and used.

CCEP Australia will work with relevant industry bodies, government agencies business partners, community groups and other concerned organisations, to promote transport safety behaviours and practices, as they relate to our activities.

1.3.7. Continually improving

The effectiveness of CCEP's management system and processes will be reviewed against internal lead and lag indicators, as well as internal and external audits, to identify areas of improvement and best practice.

We will benchmark the productivity, efficiency, innovation and safety of our supply chain partners' transport-related business practices against our other suppliers and industry standards to assist in identifying and promoting improvements and best practice.

2. Handling exceptions and managing incidents

It is not expected that there should be any exceptions to the application of this Policy Guidance.

If you observe behaviour that concerns you, or that may represent non-compliance with this Policy, you should promptly raise the issue with your manager. Raising your concerns will allow CCEP Australia to promptly deal with any issue that could pose risk to people and/or property.

Alternatively, you can raise such matters with any of the following people:

- your relevant State Manager;
- Chain of Responsibility Manager for CCEP Australia;
- General Manager – Logistics for CCEP Australia; or
- Director Supply Chain for CCEP Australia.

3. Affected procedures

Controls, procedures and processes will be maintained by CCEP Australia to identify, minimise, control or eliminate risks associated with the Core Risk Areas identified in the HVNL, with the overall structure forming part of CCEP Australia's Health & Safety Management Framework.

Local controls, procedures and processes, which extend beyond the national controls, procedures and processes of CCEP Australia, will be managed by the relevant operational business units.

- Related guidelines/work instructions
 - The following documents can be accessed through CCEP Australia's Health & Safety Management Framework:
 - Transport Suppliers Contractor Management (which is in draft as of the date of this Policy Guidance)
 - Chain of Responsibility Risk Assessment
 - Chain of Responsibility Fatigue Management procedure
 - Chain of Responsibility Speed Management procedure
 - Chain of Responsibility Load Management procedure
 - Operational work instructions, such as:
 - Load Restraint guidelines
 - Loading & Unloading trucks Safe Work Procedure
 - Packaging guidelines

- Related training
 - Role-specific Chain of Responsibility modules are to be completed in SuccessFactors on a two-yearly basis, is compulsory for any person who holds a role in the described in 1.2.2., or who otherwise has influence or control over the safety of the transport activities that CCEP Australia is involved in. More detail regarding these requirements is set out in the “CoR Learning Plan” that can be accessed through CCEP Australia’s Health & Safety Management Framework.
 - National Heavy Vehicle Driver induction, which is mandatory training to be completed in Beakon on annual basis.
- Controls in place through CCEP Australia’s monitoring program include:
 - Australian Logistics Council Master Code Auditing Service (AMCAS) subscription
 - Chain of Responsibility Process Review – Beakon Audits
 - Chain of Responsibility Annual Incident & Hazard Review – Beakon Audit
 - Reasonable Enquiry – Beakon Audit
 - Chain of Responsibility Partnership Review – Beakon Audit
 - Quarterly reviews with transportation suppliers

It is the responsibility of the Policy Owner to have oversight of the existing controls, to manage the risk as detailed in this Policy Guidance and to consider how compliance with this Policy Guidance will be monitored.

4. Policy compliance

As our policies and policy guidance are based on applicable legislation, please note that breach of or non-compliance with this Policy and the related guidance could lead to disciplinary action being taken – up to and including summary dismissal in accordance with applicable laws and/or internal policies.

For contractors and suppliers, non-compliance with the Chain of Responsibility Policy and/or this Policy Guidance may lead to the immediate termination of a contract. As such, it is expected that contractors and suppliers will enforce a similar set of standards with their employees and subcontractors to ensure compliance with the HVNL.

5. Definitions and abbreviations

Terms and abbreviations shall be interpreted in accordance with the definitions that are set out throughout this Policy.

6. Policy Management

Risk	The risk associated with CCEP's road transport activities in Australia, which includes the movement of raw materials, products and equipment.
Title of the Policy	Chain of Responsibility Policy
Scope	Geographic Policy – CCEP Australia
Policy Owner	Director Supply Chain – CCEP Australia
Initial date of approval	11 May 2022
Revision Date	11 May 2023
Version	1.0

6.1. Regulatory framework

This Policy must be interpreted in the context of CCEP's *Code of Conduct* and the related CCEP policies detailed below, and also in accordance with the provisions of such legislation as may apply to the entities or operations of CCEP.

Please note, the list of the policies below may not be complete.

CCEP policies are largely based on applicable laws and regulations, and are subject to change and may vary depending on location. If you are ever uncertain which rule or policy you should follow, or if you are concerned that there might be a conflict between applicable law and the guidance within our policy, please consult Employment Practices (P&C). Unless otherwise stated all policies are discretionary and do not confer any contractual entitlement. CCEP retains the discretion to withdraw, amend or vary this Policy at any time, subject to any applicable consultation or co-determination requirements.

Related CCEP policies (which may be consulted on Genie)

CCEP has implemented the following policy controls at a global level:

- Policy – Health, Safety and Mental Wellbeing
- Policy – Integrated QESH (Quality, Environment, Safety & Health)

CCEP Australia has implemented the following policy controls:

- Work Health and Safety Policy
- Procurement Policy
- Drug and Alcohol Policy
- Code of Business Conduct
- Whistleblower Protection Policy

6.2. Approval of the Policy

The Policy Owner has obtained the required approval of the contents of this Policy as set out below.

Department	Name, Function	Date
BU LT	CCEP Australia Leadership Team	11 May 2022

6.3. Effective date and validity

This Policy and Policy Guidance supersedes those listed below, which shall cease to apply from the date on which it takes effect:

- Policy Chain of Responsibility –Australia Beverages (Version 5 (2018))

This Policy and Policy Guidance shall apply with immediate effect once it has been approved by the appropriate responsible person within CCEP on the date indicated at the beginning. The date of revision, from which this Policy is effective, is set out in the policy outline section above.

Should some regulations of this Policy become ineffectual because of changing laws in one Country or Business Unit, the remaining will stay effectual.

6.4. Change control

This document will be revised when appropriate as circumstances change.

At a minimum, this Policy and Policy Guidance should be reviewed on an annual basis.

CCEP intends to notify employees of changes to its policies where possible. However, CCEP reserves the right to change, revise, withdraw or add to its policies, processes, procedures or guidance at any time, without notice if necessary.

6.5. Revision

The Policy Owner has responsibility for listing a summary of changes made to this Policy.