

## Freight Preparation and Compliance

### 1 Purpose

The policy ensures all goods delivered to and from Allight (Company) sites are:

- packaged in a manner that supports safe transportation
- fit-for-purpose and in serviceable condition in transit and storage
- protected and preserved for long-term storage with consideration to potential extreme conditions
- adequately identifiable with correct documentation to facilitate receipt of the goods without delay

### 2 Scope

This policy establishes the minimum labelling, packaging and transport compliance requirements. It applies to employees, contractors, suppliers and visitors (people).

This policy also references chain of responsibility (COR) and PCS-ALL-POL-0190 Chain of Responsibility must be reviewed for specific information. Broadly below demonstrates how COR is managed within the Company:

- the Company selects the most stringent requirement and apply that to all jurisdictions through procedural documentation
- the National Heavy Vehicle Law ('HVNL') and National Heavy Vehicle Regulations will apply with the exception of Western Australia that must comply with the Road Traffic (Vehicles) Act 2012 (WA) and Road Traffic (Administration) Act 2008 (WA) ('WA COR') for both light and heavy vehicles
- light vehicles are not included in HVNL, however for simplicity and to ensure that every element is considered, WA COR will apply to the Company for all vehicle types
- fatigue and speed are not included in WA COR, however for simplicity and to ensure that every element is considered, HVNL will apply to the Company

### 3 Responsibilities

#### 3.1 All people

All people will ensure:

- ensure awareness and compliance with this policy, and those listed in Related Documents
- ensure compliance to any relevant law or regulation particularly those relating to mass, dimension and load restraint
- protect all people and the environment from risk during the transportation and handling of freight
- if you are named as a party in the chain of responsibility and can exercise (or have the capability of exercising) control or influence over any transport task you must ensure compliance as per the Scope
- ensure this policy, in addition to the other policies listed in Related Documents, is implemented and understood within their respective business
- take immediate action when they become aware of a person breaching this policy and engage the People, Culture and Safety team

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## 3.2 Supply Chain partner

In addition, the supply chain partner must:

- ensure this policy, in addition to the other policies listed in Related Documents, is implemented and understood within their respective business
- take immediate action when they become aware of a person breaching this policy and engage their contact within our Company

## 3.3 People, Culture and Safety

People, Culture and Safety will:

- provide training and information to employees and contractors
- communicate changes to COR laws and requirements
- support the implementation and understanding of COR requirements
- ensure this policy remains up to date and is aware of any changes to engage all people
- be an escalation point for all people
- record completion of policy awareness on the e-learning platform
- investigate any COR breaches or incidents as per PCS-ALL-PRO-0028 Incident Reporting and Investigation
- perform regular external and internal reviews and audits to ensure compliance is maintained

## 3.4 Warehouse and Logistics Manager

The Warehouse and Logistics Manager will:

- support the implementation and understanding of COR requirements
- ensure this policy remains up to date and is aware of any changes to engage all people
- be an escalation point for all people
- ensure compliance of this policy across all people and Company facilities
- provide team guidance during external and internal reviews and audits to ensure compliance is maintained

All companies involved with the transportation of freight on Australian roads, has an onus to assess their responsibilities under the compliance and enforcement legislation and take all appropriate steps to ensure that no breaches occur by any party within their chain of responsibility.

## 4 Chain of Responsibility

It is imperative that all people understand their its responsibilities and obligations related to COR. The CoR legislation recognises the responsibilities of all stakeholders within the supply chain, in relation to the safe transportation of goods. All people must refer to PCS-ALL-POL-190 Chain of Responsibility for further information in support of this policy.

A simple way to understand whether you have an obligation is to consider:

Influence = responsibility = legal liability

## 5 Packaging Standards

The Company and its suppliers must seek to minimise hazards to all people including the general public. Packaging should therefore be designed to protect the product and all people involved in the handling of product at all points in the supply chain.

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Consultation with the Company is requested to ensure the best outcome is reached.

## 5.1 Packaging requirements

Important considerations for selecting packaging for transportation of products include:

- maintains structural integrity and will not deform or collapse under the weight of its own contents
- ability to transport without rolling, tipping, sliding or spilling
- protected to prevent corrosion during transportation and storage
- withstands multiple handling movements
- is able to be safely lifted on and off transport vehicles
- minimises risk of damage to the product itself, other freight, members of the general public, and the environment
- handles to be integrated into packaging where appropriate
- sharp items to include a durable protective cover/shield over the sharp tip/edge within the packaging to protect against injury
- contents are easily accessible when required, but will not open unexpectedly
- able to display mandatory information outlined in the labelling section of this document
- be tailored to the shape and size of the contents to minimise contained air space
- account for potential exposure to moisture during storage and/or transportation
- sufficiently robust and stable when stacked on a pallet, truck, or loaded into a shipping container
- avoid where possible: metal staples, foam and plastic packing peanuts, steel strapping

Packaged goods showing damage, defects or shortages resulting from improper packaging, packaging materials, or packing procedures, or having concealed damage or shortages at the time of unpacking, shall be subject to rejection and replacement at no additional cost to the Company. Additional costs caused by such reasons as described, shall be at the supplier's expense.

## 5.2 Additional packaging considerations

The Company is committed to reduce environmental degradation arising from the disposal of used packaging and conserve virgin materials through the encouragement of re-use and recycling of used packaging materials by supporting and complementing the voluntary strategies in the Australian Packaging Covenant (APCO).

Where possible, suppliers should adhere to APCO's (the Australian Packaging Covenant Organisation's) to reduce the possible impact our products have on our community and environment. These guidelines assist the design, manufacture and end-of-life management of packaging and advise on issues for consideration regarding more sustainable packaging.

## 5.3 Returnable and reusable packaging

The Company works with its suppliers to develop and implement returnable and reusable packaging solutions. Allight is confident that by adopting green initiatives into our supply chain, we can make a significant contribution to reducing our environmental impact and minimising our carbon footprint. Therefore, we also encourage customers, suppliers, and contractors to reduce their own carbon footprint and to identify measures that mitigate the environmental impact of their activities, products and services. We are committed to working towards solutions that make this type of packaging a reality.

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## 5.3.1 All items

In addition to the requirements listed in specific sections, there is a preference for all crates, cages, stillages and pallets to be:

- sized for easy storage in standard Australian pallet racking
- provisioned with appropriate locking boards or other arrangements for safe storage in pallet racking
- provisioned with appropriate access and load spreading to enable movement by standard forklifts, and manual and electric pallet jacks
- stackable, with clear marking indicating maximum stacking height
- returnable for reuse in future supply, with a view to ongoing use for the product life cycle of the item
- have items secured with consideration to enable efficient handling at point of use, both in warehousing and production operations
- multiple items may be allowed per crate, in consultation and with agreeance by the Company, where these items are used in the same work centres and items shall be clearly segregated

## 5.3.2 Cartons

Cartons must:

- be structurally sound and free from any visible damage
- be limited to 15kg to be manageable by a single person
- be clearly marked when consignments weight more than 15kg, and must be marked as **"HEAVY >15kg"**

## 5.3.3 Skids

Skids are small pallets without under rails, which are not weight rated, and:

- have very limited application in the Company industry and should be avoided where possible
- may be suitable for light, low-profile materials

## 5.3.4 Timber crates

Timber crates must:

- be of a suitable construction for the products being shipped, preferably hardwood, and must provide adequate support to the product
- have a safe working load that exceeds the weight of the product
- be sealed with screws for ease of access and be structurally sound and constructed for handling by a forklift

## 5.3.5 Cages

Cages must:

- be fit-for purpose, in good condition and able to support the combined weight of the product within the cage
- have product placed in the cage to support good manual handling practices
- have product restrained to the base of the cage to prevent movement

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- be retained by strapping, blocking, packing or other sufficient products to prevent movement

### 5.3.6 Stillages

Stillages must:

- be fit-for purpose, in good condition and able to support the combined weight of the product within the stillage
- have product placed in the stillage to support good manual handling practices
- have product loaded into the stillage so as to prevent movement
- be retained by strapping, cradling, packing or other sufficient products to prevent movement

### 5.3.7 Pallets

Review of WAL-ALL-PRO-0187 Pallet Racking Safety is required. Pallets must:

- be used for all products that require mechanical lifting during handling
- comply with AS 4068-1993 Flat Pallets for Materials Handling
- ensure products do not exceed 1.8 metres high
- be free from foreign objects; dirt, spider webs, spiders, ants, nests, and any other foreign matter including plants and seeds, moss, fungus and spores and comply with International Standards for Phytosanitary Measures No. 15 (*ISPM 15*) for global shipping, and be certified before passing through customs
- be used for products that:
  - have dimensions that allow stable loading on the pallet
  - do not exceed the static or dynamic load capacity ratings
  - do not exert excessive point loads on the pallet
  - have a safe working load that does not exceed the safe working load of the pallet
- be non-returnable as the Company is unable to facilitate any successful exchange or return of the pallet
- constructed to AS 4068-1993 Flat Pallets for Materials Handling and AS 4084-2012 Steel Storage Racking (sized 1165mm x 1165mm) which is the preferred design for all pallets, crates, and cages handled by the Company



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## 5.3.7.1 Packing and restraining products on a pallet

The correct use of a pallet should be such that the goods placed on the pallet are packed with the relevant labelling facing outward where possible to facilitate receipting, and appropriately strapped and wrapped to facilitate mechanical loading, unloading and transportation.

The weight of each pallet should be less than the SWL (safe working load) rating of the pallet selected. In order to ensure safety during transportation, the height of the centre of gravity of the loaded goods should not exceed two-thirds of the width of the pallet.

In addition:

- product must be secured on the pallet to prevent uncontrolled movement
- products likely to roll or fall must be chocked and restrained by appropriate measures capable of bearing the unrestrained weight of the products to the pallet
- fit-for-purpose restraint material must be secured to the pallet bearers and not the boards which may become loose by movement
- products must not overhang the forklift entry points of the pallet
- plastic wraps such as stretch wrap and shrink wrap are not suitable restraint mechanisms and should only be used for lightweight products
- if binding of materials is required, clear plastic wrap should be utilised for ease of inspection
- steel strapping is considered a hazard and should not be applied to restrain products to a pallet
- nylon weight-rated banding or polyester strapping is suitable for restraining products to a pallet

## 5.4 Air freight

Consignments travelling by air transport must be packaged in accordance with airline industry standards (IATA - <https://www.iata.org/>) in such a way as to minimise total weight and promote ease of handling.

## 5.5 International freight

Freight movements that involves international transportation are subject to all the requirements identified in this document, as well as any additional requirements to ensure safe and secure sea or air transport.

Such requirements include, but are not limited to:

- ensuring that products and packaging are not damaged as a result of exposure to sun, wind or sea spray during transport
- freight Handling at seaports or airports is considered, with additional lifting points installed if required
- safety considerations applicable to sea or air transportation, e.g. dangerous or hazardous goods restrictions for air transport
- ensuring all requirements for transit through local and/or international customs are considered
- packaging materials are in accordance with Australian Standards and legislation

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## 6 Labelling Standards

The following requirements must be printed (not handwritten) on every level of a Stock Keeping Unit (SKU) packaging:

### 6.1 Mandatory inclusions








- product description (detailed – including product, variant, and size)
- total gross weight (kilograms) if product exceeds 10kgs
- total quantity of units within outer packaging (e.g., 10 x 100pcs)
- applicable warning label (including shipper's name) displayed close to the gross weight
- brand, model, serial number (if applicable)
- part number (should be the same one displayed on the delivery docket and the same as the Company uses to order the product)
- advisory symbols or labels (if applicable)

### 6.2 Kitting products

As per Mandatory Inclusions and:

- kitting identifier, (eg; 1 of 3, 2 of 3, etc)
- gross weight (kilograms) on each package if individual component/s exceeds 10kgs
- check-box information should not be used
- labelling for plastic wrapped SKUs to be displayed on two opposite sides if adjacent cannot be achieved

Some examples of appropriate labelling:

Directional stacking symbols	 'THIS WAY UP' or			
Optimum pallet stacking configuration on top of SKU (outer only)	(a) 	(b) 	(c) 	(d) 
Care directions if contents are fragile	 HANDLE WITH CARE		 FRAGILE	

### 6.3 Additional requirements

In addition to Mandatory Inclusions, the following should also be displayed, particularly on international freight:

- Company purchase order number
- country of origin
- carton count
- mixed SKUs (if there are multiple SKUs per pallet / carton):

for cartons or pallets containing mixed SKUs, remove any pre-existing labelling and include gross weight on external packaging. No part number is required on the external packaging if there are mixed SKUs within, but it should be clearly marked "**MIXED SKUs**".

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- full quantity not contained:

for cartons or pallets that do not contain the full quantity stated on the outer packaging, mark outer packaging “**PARTIAL**” and amend the gross weight and place a dark line through any pre-existing printed quantities on the outer packaging

- warning labels must not cover any other shipping marks or product specific labelling
- products exceeding 30kgs, palletisation or multiple packages should be considered where possible
- freight units over 1.2m (120cm) display warning labels at alternate ends, and ideally at all forklift entry-points for the attention of forklift operators

## 6.4 Importing goods

Imported goods should carry country of origin information in English, in prominent and legible characters. Where products are imported from countries not using metric measurements, e.g., US and in some instances, UK, the units of measurement should be changed from imperial to metric. For Australian requirements information can be found [abf.gov.au](http://abf.gov.au).

## 6.5 Exporting goods

Exported goods should adhere to export controls and sanctions laws. Please consult PCS-ALL-POL-0109 Export Controls and Sanctions for further information in addition to [defence.gov.au](http://defence.gov.au).

## 6.6 Dangerous goods

If a product has been identified as Dangerous Goods, it must carry information about the volume of the contents, not just the volume of the packaging.

Consult relevant legislation for additional information. In Western Australia the information can be found here: [Dangerous Goods Safety Legislation](#) and AS/NZS 4452:1997 Storage and Handling of Toxic Substances also applies.

## 6.7 Compliance adherence

Other labelling that may be required is based upon the relevant legislation for a specific product and may be in addition to Company requirements. This may include, but not be limited to, Dangerous Goods placarding and other requirements, medical, or environmental advice.

Most compliance markings that should be included in packaging is product-specific and too broad-ranging to address here.

All products supplied to the Company must comply with all relevant legislation, including the relevant product safety and information standards. It must be emphasised that any “claim” on the product is supported by the appropriate facts, e.g. if packaging claims to be ‘*recyclable*’, the Company should be able to support these claims.

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To find out about product safety and information standards refer to the appropriate government departments or applicable standard.

## 7 Related Documents

This policy should be read in conjunction with the following internal documents (i.e. internal documents such as policies, procedures, forms).

Document Number	Title
PCS-ALL-POL-0109	Export Controls and Sanctions
PCS-ALL-POL-0190	Chain of Responsibility
PCS-ALL-PRO-0028	Incident Reporting and Investigation
WAL-ALL-PRO-0187	Pallet Racking Safety

This policy should be read in conjunction with applicable legislation and regulations.

## 8 Document Amendment History

Rev	Date	Description	Prepared by	Reviewed by	Final approval by
.00	August 23	Creation	Warehouse & Logistics Manager	GM PCS	GM OPS

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