# **ENFORCEABLE UNDERTAKING**

# Chapter 10.1A Heavy Vehicle National Law

The commitments in this enforceable undertaking are offered to the National Heavy Vehicle Regulator

Ву

Zezt Pty Ltd

ABN: 30 609 589 808

#### PART 1 - GENERAL INFORMATION

# SECTION 1 - PURPOSE

 The purpose of this enforceable undertaking is to document the undertakings offered to the National Heavy Vehicle Regulator (NHVR) pursuant to Chapter 10.1A of the Heavy Vehicle National Law (HVNL) in connection with a matter relating to an alleged contravention of the HVNL.

#### SECTION 2 - DETAILS

- The commitments in this enforceable undertaking are offered to the NHVR by Zezt Ptv Ltd (Zezt).
- 3. This enforceable undertaking is given on the day and date that it is accepted and signed by the NHVR. The undertaking and its enforceable terms will operate as a legally binding commitment on the part of the person from the date it is given.

# Details of the person proposing the undertaking

Registered Address: 10 Terra Nova Drive, Wynyard, Tasmania 7325

Postal Address: As above

Telephone: 03 6442 2699

Email Address:

Legal Structure: Proprietary Company, Limited by Shares. Zezt is a subsidiary of Vinidex Pty

Ltd, part of the Aliaxis Group of companies

Type of Business: Manufacturing of polyethylene pipe

Commencement of entity: Zezt was registered on 1 December 2015

Number of workers: 34 Zezt employees and 5 contract workers

Products and/or services: Zezt specialises in the manufacture and supply of extruded polyethylene pipe

for use in water transfer, gas and electrical applications.

# Details of the alleged contravention

4. It is alleged by the NHVR that on 1 July 2020, Zezt failed to comply with the mass requirements as required by section 96(1)(c) of the HVNL.

# Details of the events surrounding the alleged contravention

- 5. On 1 July 2020, at approximately 2.35pm, a Tasmanian registered heavy vehicle was stopped and weighed at the Forest Farm Weighbridge on the Bass Highway. It is alleged that the mass of the vehicle and load exceeded the steer axle group limit of 6.50 tonnes. The mass of the steer axle group was assessed to be 7.92 tonnes, 126.46% of the permitted steer axle group limit, this being a severe mass breach.
- 6. The operator of the vehicle at the time of the alleged breach was an employee of Wynyard Contracting Services Pty Ltd, a contractor engaged by Zezt to collect goods. The operator was requested by Wynyard Contracting to collect 8.5 bags of HDPE pelletised waste from Environex Georgetown site and deliver to Zezt's site in Wynyard. It was part way through this journey that the alleged breach occurred.

# The details of any injury or financial loss that arose from the alleged contravention

There were no injuries or financial loss that arose as a result of the alleged contravention.

# The details of any notices issued that relate to the alleged contravention

8. Zezt has received a Summons in respect of the alleged contravention that occurred on 1 July 2020 in relation to a hearing before the Burnie Magistrates Court of Tasmania.

The details of any existing transport safety management systems at the workplace including the level of auditing currently undertaken

- Zezt has an established comprehensive safety management system in place which encompasses Chain of Responsibility compliance.
- 10. Zezt's existing transport safety management system at the workplace is supported by the following procedures and documents:
  - (a) Load Declaration Sheet provided to transport providers on pick up of goods (external provider);
  - (b) Despatch Distribution Checklist completed by Distribution Supervisors at Zezt (internal document);
  - (c) Daily photographs taken of despatched loads showing correct loading procedures are followed (internal document); and
  - (d) Signed Zezt delivery document received back from customer upon receipt of delivery (internal document).

All of the above procedures are performed daily and are filed in Zezt's document management system M-Files for traceability.

- 11. As part of this system, Zezt engages transport providers under a Supply Agreement containing terms providing that the transport provider is required to:
  - (a) deliver the services in accordance with all State and Commonwealth laws and regulations including but not limited to the 'Vehicle Laws' (defined to include the HVNL);
  - (b) ensure compliance with all occupational health and safety laws in relation to the safe loading, transportation and unloading of goods, with the transport provider acknowledging that Zezt may audit the transport provider's compliance with these laws;
  - acknowledge that it is Zezt's specific and expressed direction that the services should be provided strictly in accordance with all Vehicle Laws;
  - (d) ensure that all vehicles conform with Load Restraint Guidelines and Vehicle Laws;
  - (e) ensure that it fulfils the duties and obligations of an operator under the Vehicle Laws:
  - (f) upon request from Zezt, obtain, maintain and promptly, produce to Zezt for inspection proof of compliance with its duties and obligations under the Agreement, including certificates of registration for vehicles, licenses for its drivers, and evidence that its drivers have received training in relation to Chain of Responsibility on an annual basis;
  - (g) ensure that each of its employees, agents or contractors involved in the carrying out of the services;
    - assist in the loading and unloading of vehicles and are responsible for checking the load for correct quantities of products and the safety and satisfactory method of loading such products;
    - (ii) are given adequate and appropriate information, instruction, training and supervision in relation to the Vehicle Laws;
  - (h) be responsible for all permits, weighbridge and other fees, including fines, the supply and maintenance of all necessary equipment and gear and costs necessary or desirable for the safe and legal performance of the services;

- load and unload its vehicles in a manner satisfactory to Zezt, and secure goods in accordance with applicable restraint guidelines and all Vehicle Laws;
- ensure that when a vehicle is loaded it is loaded within its legal loading limit as defined by the Vehicle Laws and any other prevailing State legislation;
- (k) comply with relevant occupational health and safety legislation and regulations and certify such compliance;
- ensure that a safe system of work is followed by its employees and agents when providing the services;
- ensure its employees are provided with such information, instructions, training and supervision as is necessary to enable them to provide the services in a way that is safe and without risks to health;
- (n) immediately notify Zezt of any infringement notice (other than any parking infringement notice)
  or improvement notice that is issued to the transport provider or any of its employees in the
  course of providing the services;
- (o) immediately notify Zezt of any occupational health and safety issue, investigation or prosecution involving any vehicle or its load or relating to the services and attend to any legal requirements in respect of such issue, investigation or prosecution;
- (p) ensure that all its employees, agents and contractors involved in the supply of services have the knowledge, qualifications, skills and experience appropriate for supply of the services and have been trained and instructed appropriately to supply the services; and
- (q) ensure that all people in its control and performing work at any time are adequately trained, competent and, where appropriate, suitably licensed.

# Any consultation undertaken within the company regarding the proposal of an EU

- 12. Consultation has been taken regarding the proposed EU within Zezt's leadership and management team and workforce through the following established mechanisms:
  - (a) Team from high level management: Grant Ollington (General Manager Zezt); Michael Demine (General Manager Supply Chain Vinidex); Graham Jones (National Freight & Distribution Manager Vinidex); Julie Reynolds (Chief Financial Officer Vinidex), Darren Hall (General Manager Safety, Health & Environment Vinidex);
  - (b) Team from ground level management: Grant Ollington (General Manager Zezt); Brad Crawford (Distribution Supervisor Zezt Wynyard); Lawrence Graham (Despatch & Yard Supervisor Zezt Derrimut.

# SECTION 3 - STATEMENTS

#### Statement of assurance

13. Zezt confirms that it is committed to complying with its obligations under the HVNL and ensuring, so far as is reasonably practicable, the health and safety of all workers and others that have the potential to be affected by its business or undertakings.

#### Statement of regret

14. Zezt regrets that the incident on 1 July 2020 occurred.

# Statement of ability to comply

15. Zezt confirms that it has the financial and operational capacity to comply with the terms of this enforceable undertaking.

#### Statement granting permission to use

16. Zezt grants the NHVR permission to use any documents, policies and procedures developed as a result of this enforceable undertaking for the purpose of training and development by the NHVR.

# **SECTION 4 - ACKNOWLEDGEMENT**

- 17. Zezt acknowledges that the NHVR alleges that Zezt has contravened section 96(1)(c) of the HVNL.
- 18. The alleged contraventions are taken very seriously by Zezt, its Directors and Senior Management, who are committed to providing a safe and healthy workplace to conduct its business in a way that helps protect the environment and the communities in which it operates.

#### SECTION 5 - DETAILS OF INJURY OR ILLNESS

# Types of workers compensation provided (if the injured person is a worker of the person)

19. Not applicable. No injuries were sustained to workers or members of the public as a result of the alleged contravention.

# Support provided, and proposed to be provided, to the injured person to overcome injury/illness

 Not applicable. No injuries were sustained to workers or members of the public as a result of the alleged contravention.

# **SECTION 6 - RECTIFICATIONS MADE**

21. Zezt is committed to ensuring it has developed systems that identify, assess and control risks and are designed to promote continual improvement and as a result of the alleged contravention, the following opportunities for enhancement of processes have been undertaken:

Description  The control of the cont	\$ Amount (Estimated internal staff costs)
Zezt has elevated Wynyard Contracting to Gold Tier within its vender qualification system iPRO, ensuring greater evidence and visibility on Chain of Responsibility requirements.	\$2650 p/a
Wynyard Contracting Pty Ltd are required to provide training plans to Zezt for evidence of driver Chain of Responsibility competence, done via the iPRO system.	Included in above cost
Chain of Responsibility training (TLIF0001 Apply Chain of Responsibility Legislation, Regulation and Workplace Procedure) has been delivered to all Distribution Centre Leads.	\$4560 p/a
Details of the breach of which Zezt has been charged have been distributed internally and externally to the organisation's contract transport providers.	\$3000 p/a
Monthly review meetings between Zezt and Wynyard Contracting Pty Ltd are being held to discuss training of drivers, and any onboarding of new drivers and other relevant Chain of Responsibility subjects.	\$1920 p/a
Zezt has introduced a driver Load Declaration Sheet. This is a joint form signed off by both loader and vehicle driver on Chain of Responsibility requirements.	\$12,000 p/a
All correspondence regarding transportation of non-Zezt products are now made via email instead of by phone to record actual requests made by Zezt to Wynyard	Normal ongoing distribution costs

Contracting Pty Ltd and other transport providers.	
Total cost p/a	\$24,130 p/a

#### SECTION 7 - ACKNOWLEDGEMENT OF PUBLICATION

22. Zezt acknowledges that the enforceable undertaking will be published on the NHVR's internet site and may be referenced in the NHVR's publications.

# PART 2 - ENFORCEABLE TERMS

# **SECTION 1 - COMMITMENTS**

# Commitment that the behaviour that led to the alleged contravention has ceased and will not reoccur

23. Zezt is committed to ensuring that the behaviour that led to the alleged contravention has ceased and that it will take all reasonably practicable steps to prevent recurrence.

# Commitment to the ongoing effective management of public risk associated with transport activities

- 24. Zezt is committed to the ongoing effective management of public risks associated with transport activities within its business operations.
- 25. Zezt has a commitment to ongoing continuous improvement in how it manages risks associated with its business operations, including the review of new technology when made available.

# Commitment to disseminate information about the EU to workers and other relevant parties in the chain of responsibility

- Zezt is committed to disseminating information about the enforceable undertaking to workers and other relevant parties within the chain of responsibility, including Zezt's, senior and operational management, health and safety management team, Health and Safety Committees and Health and Safety Representatives, workers, and all relevant contractors and subcontractors working for Zezt. This information will be disseminated through:
  - (a) For internal employees: Records kept in dedicated workspace in M-Files; Toolbox talks by Distribution Supervisors and Production Managers.
  - (b) For external contractors and sub-contractors: communication provided by Department Heads noted in paragraph 12(a); and
  - (c) all email correspondence captured through document management system CRM.

# Commitment to participating constructively in all compliance monitoring activities of the EU

- 27. Zezt is committed to participating constructively in all compliance monitoring activities of the EU.
- 28. Zezt acknowledges that responsibility for demonstrating compliance with the undertaking rests with Zezt and evidence to demonstrate compliance with the terms will be provided to the NHVR by the due date of each term.
- 29. It is acknowledged that the NHVR may undertake other compliance monitoring activities to verify the evidence and compliance with an enforceable term, and cooperation will be provided to the NHVR including providing details of workshops and training conducted for industry and community benefit.

Commitment that any promotion of a benefit arising from the EU will clearly link the benefit to the undertaking and make it clear that the undertaking was entered into as a result of an alleged contravention

30. Zezt is committed to ensuring that any promotion of a benefit arising from this enforceable undertaking will clearly link the benefit to the undertaking and that the undertaking was entered into as a result of the alleged contravention.

#### SECTION 2 - STRATEGIES THAT WILL DELIVER BENEFITS

# Benefits to drivers and parties within the chain of responsibility

- 31. As part of this enforceable undertaking, Zezt aims to deliver strategies that focus on:
  - (a) benefits to drivers and parties within the chain of responsibility; and
  - (b) benefits to the transport industry and the broader community.
- 32. Zezt intends to achieve these outcomes through the implementation of the strategies set out below that aim to educate, train and raise awareness among Zezt's workforce and all parties within the chain of responsibility of the importance of complying with Chain of Responsibility laws.

#### Activities

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Activity 1 - Ensuring compliance with Chain of Responsibility requirements and greater management of contractors' responsibilities through use of the iPRO platform

#### Scope

Zezt has aligned its risk and management of suppliers and contractors with its parent company, Vinidex, by joining iPRO, an online compliance and contractor management platform.

Zezt has also elevated Wynyard Contracting Pty Ltd to Gold Tier within iPRO, ensuring that there is greater evidence and visibility on Wynyard Contracting Pty Ltd's compliance with Chain of Responsibility requirements. Zezt will also implement this with all contractors going forward, to ensure that Zezt has clear oversight of contractors' activities and the systems these contractors have in place to ensure Chain of Responsibility compliance.

Wynyard Contracting Pty Ltd will also be required to provide training plans to Zezt for evidence of drivers' Chain of Responsibility competence, done via the iPRO system.

#### Details

Zezt is committed to managing its relationship with contractors and ensuring proper oversight of contractors' compliance with all statutory safety obligations through the iPRO platform and the iPRO Risk Management Guidelines.

The Risk Management Guidelines set out the assessment mechanism that is used to assess and verify contractors' compliance with statutory requirements, including Chain of Responsibility obligations.

As part of the iPRO compliance system, contractors who provide transport and logistics services (commencing with Wynyard Contracting Pty Ltd) will also be required to provide evidence of training plans for drivers' competence, including training in Chain of Responsibility.

# Timeframe

This has already been implemented with Wynyard Contracting Pty Ltd, and will be implemented with all contractors on an ongoing basis upon acceptance of this enforceable undertaking.

#### Outcome

Improvement in contractor management and awareness of contractors' compliance with Chain of Responsibility requirements across all levels of Zezt's supply chain.

#### Costs

Estimate of \$ 2,650.00 p/a

#### Output

The iPRO Risk Management Guidelines and examples of iPRO reports showing contractor compliance for the 12 month period following acceptance of this enforceable undertaking will be submitted to the NHVR as evidence of this deliverable.

# Activity 2 - Undertaking Chain of Responsibility audits in line with a planned schedule

#### Scope

Zezt will schedule and facilitate regular (internal and external) audits to assess current management protocols for heavy vehicle operations.

#### Details

The purpose of the audits will be to identify any gaps in existing safety management systems and additional opportunities for improvement and best practice methods for ensuring compliance with mass requirements within heavy vehicle operations.

The audits will take place regularly and in accordance with an established calendar and will include:

- A desktop review of Zezt's existing systems and associated procedures for the management of compliance with Chain of Responsibility requirements. This is done annually through the ISO 9001 audit with SAI Global;
- Interviews with Zezt personnel involved in the management of compliance with Chain of Responsibility requirements: this is done monthly through the internal review of the Zezt Competency and Training Register; and
- Review of Zezt's level of implementation of processes for the management of compliance with Chain of Responsibility requirements: this is done on a quarterly basis at the meeting of the Zezt Extended Leadership Group.

# Timeframe

Audits as noted above are already in place and part of the Zezt business practice.

#### Outcome

Identification of measures that can be taken to enhance existing procedures and processes for ensuring Chain of Responsibility compliance.

#### Costs

Estimate of SAI Global (ISO 9001) audit \$ 10,500 p/a

# Output

Copies of examples of audit reports for the 12 month period following acceptance of this enforceable undertaking will be provided to the NHVR as evidence of this deliverable.

Activity 3 – Implementation of nationally accredited Chain of Responsibility training for Distribution Centre Leads.

# Scope

Going forward, all permanent and acting Distribution Centre Leads will be required to complete nationally accredited Chain of Responsibility training (either TLIF0001 - Apply chain of responsibility legislation, regulations and workplace procedures or TLIF0009 - Ensure the safety of transport activities (Chain of Responsibility)).

#### Details

Since the breach occurred, Zezt has required its two Distribution Centre (DC) Managers to complete the nationally accredited Unit of Competency TLIF0001 - Apply chain of responsibility legislation, regulations and workplace procedures.

As that has now been superseded by the new Unit of Competency, TLIF0009 - Ensure the safety of transport activities (Chain of Responsibility), Zezt will be implementing that course for future training purposes. This unit of competency has now been added to the Zezt Competency and Training Register as a required training for distribution team.

As part of Zezt's safety management strategy going forward, Zezt will require any incoming DC Managers to complete the training as part of their induction. Any personnel assigned to act as DC Manager on a substitute or acting basis will also be required to complete the training.

#### **Timeframe**

This will commence upon acceptance of this enforceable undertaking.

#### Outcome

Improvement in awareness of Chain of Responsibility requirements among Distribution Centre management and promoting compliance with those requirements among the workforce.

#### Costs

Estimate of \$4,560 p/a

# Output

A copy of examples of the training records and evidence of completion of the accredited training by Zezt personnel for the 12 month period following acceptance of this enforceable undertaking will be submitted to the NHVR as evidence of this deliverable.

# Activity 4 - Dissemination of information regarding breach and case study

# Scope

Information regarding the breach of which Zezt been charged has been distributed internally to Zezt's workforce and externally to the organisation's contract transport providers. Zezt will also produce a 'case study' outlining the circumstances of the breach and the preventative measures that could have been taken to avoid the breach and will present this in a publishable form that can be shared with other organisations and stakeholders in the transport and logistics industry.

# Details

Zezt will distribute information regarding the circumstances of the breach with the management teams of every transport provider it engages in Australia (a total of 5 transport provider companies employing over 400 employees), and requested that the information is discussed with their workforce in their toolbox meetings, thereby increasing awareness of the potential for such breaches to occur and sharing lessons in

relation to potential gaps in existing safety management systems and ways to fill them.

In addition to disseminating the information among its workforce and transport providers and promoting the importance of meeting Chain of Responsibility obligations, Zezt will prepare a 'case study' that outlines the circumstances of the breach, discusses the gaps in contractors' existing safety management systems and Zezt's oversight and monitoring of those systems that contributed to the breach occurring, and the steps that have been and will be taken by Zezt to ensure that these gaps are filled to ensure that Chain of Responsibility requirements will be complied with going forward.

The case study will be published as a Safety Alert or Bulletin that will be distributed and shared among other stakeholders in the heavy vehicle transport industry to educate and raise awareness of the importance of monitoring compliance with Chain of Responsibility requirements at every level of the supply chain, including when engaging contractors.

#### Timeframe

In addition to the steps already taken to disseminate the information of the breach to its workforce and transport providers, Zezt will publish and share the case study with other stakeholders in the heavy vehicle transport industry within 3 months of acceptance of this enforceable undertaking.

#### Outcome

Increasing awareness and promoting and educating others within the heavy vehicle transport industry in relation to the importance of compliance with Chain of Responsibility requirements.

#### Costs

Estimate of \$500

#### Output

A copy of the Safety Alert or Bulletin to be published and shared by Zezt will be submitted to the NHVR as evidence of this deliverable within three months following acceptance of this enforceable undertaking.

# Activity 5 - introduction of a driver Load Declaration Sheet

#### Scope

Zezt will introduce a driver Load Declaration Sheet. This is a joint form signed off by both the loader of a vehicle and the vehicle driver confirming that Chain of Responsibility requirements have been checked by both the loader and driver and complied with. This form is already being implemented with Wynyard Contracting Pty Ltd and will also be implemented with all transport providers engaged by Zezt going forward.

# Details

Zezt has designed and will implement going forward a driver Load Declaration Sheet that requires both the loader of a heavy vehicle and the driver of the vehicle to check that all Chain of Responsibility requirements are met.

Specifically, the form will require the party responsible for loading the vehicle to inspect the vehicle and confirm before the vehicle departs the loading bay information including:

- whether the vehicle has been loaded in compliance with applicable loading and unloading Standard Operating Procedures;
- whether the vehicle's load has been loaded in such a way so that it is evenly distributed in compliance with applicable mass requirements for each individual axle group; and
- · whether the vehicle's load has been restrained correctly.

In addition, the driver of the vehicle will, before commencing the delivery, be required to check and confirm

information including:

- · whether the vehicle has been loaded and restrained correctly; and
- whether the vehicle's load exceeds prescribed dimension or mass limits, and if so, whether the
  driver has the required permits for this load.

By making the use of the form a mandatory requirement for all parties engaged by Zezt to load and drive heavy vehicles as part of its operations, Zezt hopes to increase general compliance with Chain of Responsibility requirements among all parties within the supply chain and promote the importance of checking and monitoring that these requirements have been met among its contractor workforce.

Zezt is also prepared to offer the form as a template that can be used by other stakeholders and businesses operating within the transport and logistics industry as a means, to increase Chain of Responsibility compliance.

# Timeframe

Zezt has already commenced implementing the form with some of its transport providers, but will expand the use of the form to apply to all of its providers going forward and will also offer the form as a template to be used by other stakeholders within the industry immediately upon acceptance of this enforceable undertaking.

#### Outcome

Improving and promoting general compliance with Chain of Responsibility requirements among all parties within the supply chain, including contractors. The addition of MAEL as an external auditor will support this outcome.

#### Costs

Estimate of \$ 3000 p/a

#### Output

A copy of the Driver Load Declaration Sheet will be submitted to the NHVR for its review as evidence of this deliverable.

Activity 6 – Regular review meetings between Zezt and transport providers to monitor Chain of Responsibility compliance

#### Scope

Zezt will conduct regular review meetings with its transport providers to review and discuss the systems being implemented by the providers to train their drivers and ensure general compliance with Chain of Responsibility requirements.

#### Details

Zezt will conduct regular meetings with its transport provides to ensure greater oversight and monitoring of providers' compliance with Chain of Responsibility requirements.

As part of this strategy, Zezt will develop an agenda for the meetings that will focus on discussion of systems implemented by the transport providers to train its drivers, including onboarding for new drivers, and ways in which the providers are monitoring and ensuring Chain of Responsibility compliance among its workforce.

This will be adopted with all transport providers going forward.

#### Timeframe

These meetings will be implemented and scheduled immediately upon acceptance of this enforceable

undertaking.

#### Outcome

Increased accountability of transport providers in relation to Chain of Responsibility compliance and improvement in Zezt's ability to provide oversight of and monitor its providers' compliance.

#### Costs

Estimate of \$ 1920 p/a

#### Output

A copy of the template agenda for these meetings will be submitted to the NHVR as evidence of this deliverable.

# Activity 7 - Written confirmation of the transport of non-Zezt products

# Scope

One of the issues arising from the breach was that the request for the pick-up and delivery of the items in question (that were not Zezt products) was done by telephone, so there was no written record of the request. Going forward, all correspondence regarding transportation of non-Zezt products will now be made via email instead of by phone to record actual requests made by Zezt to its transport providers.

#### Details

As a result of the breach, Zezt has reviewed its processes in relation to circumstances where transport providers may be required to pick up and deliver a non-Zezt product, as was the case with the breach incident. Going forward, it will be a mandatory requirement that if transport providers are requested to pick up and/or deliver a non-Zezt product, the request must be in writing (i.e. made by email) and a record kept of the request on Zezt's internal record register CRM for all relevant transport providers.

# Timeframe

Zezt will introduce this mandatory requirement immediately upon acceptance of this enforceable undertaking.

# Outcome

Improved record-taking in relation to delivery and transport of non-Zezt products.

# Costs

Estimate of \$300 p/a

# Output

Copies of records kept of the requests made over the 12 month period following acceptance of this enforceable undertaking will be submitted to the NHVR as evidence of this deliverable.

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The total estimated value of the undertaking is \$23,430.

# PART 3 - OFFER OF UNDERTAKING

# Executed as an Undertaking

Executed by Zezt Pty Ltd (ACN 609 589 808) pursuant to section 127(1) of the Corporations Act 2001 (Cth) by:

Signature of Director	Signature of Director/Company Secretary
David Bird	Julie Reynolds
Name of Director (print)	Name of Director/Company Secretary (print)
	j.
Date: 13 August 2021	Date: 13 August 2021

# PART 4 - ACCEPTANCE OF UNDERTAKING

Accepted by the National Heavy Vehicle Regulator pursuant to sections 590A(2) and 661(1)(b) of the Heavy Vehicle National Law by:

Signature of Chief Executive Officer	
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SAL PETROCLITTO	
Name of Chief Executive Officer (print)	
rame of other Executive officer (print)	
- 1 1	
Date: 18/8/2021	
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