

Sub-contractor Instructions

The drivers of our sub-contracted hauliers are seen as a key representative of our company and as such, their standards of professional competence, courtesy, and personal appearance directly influence our customers' perception of P&O Ferrymasters.

As a subcontractor of P&O Ferrymasters you must make sure that your drivers are aware of and comply with the following instructions. Acceptance of any work from P&O Ferrymasters constitutes acceptance of these instructions.

Corporate Social Responsibility Statement

P&O Ferrymasters recognises that its business must be conducted in a socially responsible way. We are committed to the achievement and maintenance of the highest standards in all aspects of our activities. P&O Ferrymasters requires that its subcontractors also commit to:-

- Abiding by the laws of the countries in which it operates.
- Preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.
- Prohibiting the use of child labour in its activities and by its sub-contractors.
- Creating and maintaining a working environment in which the capabilities of all employees are developed and to provide competitive terms and conditions.
- Recognising and respecting the human rights, dignity and needs of all employees.
- Conducting its business with honesty and integrity and applying the highest ethical standards.
- Seeking to contribute to the well-being and development of the communities in which it operates.
- Protecting and enhancing the health, safety and welfare of its staff and seeking to avoid or minimise any adverse environmental impacts.
- Building and maintaining open and effective two way communications on environment and community involvement.

1. General and Operational Instructions

1.1 Driver Selection and Recruitment

- Subcontract hauliers must ensure that all drivers working for them:-
 - comply with all legal requirements as detailed by the laws in the countries that they operate.
 - Are honest and reliable and have been screened prior to employment
 - Are physically capable to complete the job and task required
 - Have been trained in the operation of Trailers / Containers

1.2 Alcohol and Drugs

- It is against the law to drive under the influence of alcohol or drugs. Drivers working for our Subcontract hauliers must comply with the legislation of the country through which they are driving and with their own company policy.

1.3 Seat Belts and Mobile Phones

- Drivers must comply with the legislation regarding the wearing of safety belts in the country through which they are driving.
- When driving full attention should be given to the road. It is an offence to use a handheld mobile phone whilst driving.
- Certain customers do not allow the use of hands free mobile devices when moving their loads.

1.4 Drivers Hours

P&O Ferrymasters does not support any breaking of EC Regulation 561/06, which covers driving hours and the fitting and use of recording equipment (Tachographs). It is both the responsibility of the haulier and the driver to understand and comply with the law.

1.5 Unauthorised Passengers

Passengers, other than authorised crew members, are not to be carried in vehicles without the express written permission of P&O Ferrymasters. Passengers are not allowed at anytime when transporting regulated Dangerous Goods

1.6 Personal Appearance

- All clothing should be clean and appropriate.
- Company Uniforms, where provided, should be worn.

2. Personal Protective Equipment (PPE)

Drivers are required to have the following PPE:

- Hi-visibility jacket or waistcoat
- Goggles / Safety Glasses
- Gloves
- Covered arms and legs (e.g. overalls)
- Safety hard hat
- Safety footwear, e.g. boots
- Additional driver protective equipment (e.g. chin strap; hearing protection) may be required if specified by a customer. All items of PPE issued must conform to the relevant European standard. Drivers should follow manufacturer's instructions on the wearing of PPE.

- Additional driver protective equipment (e.g. face masks, face coverings and / or gloves) may be required by a customer or in line with national legislation

3. Truck and Trailer / Swap body / Container condition

Trucks / Vehicles

Trucks / Tractor Units / Vehicles must be fitted with a vehicle park brake alarm which activates when the vehicle park brake is not applied and the door is open.

Trailer / Swap body / Container

Before loading, drivers must ensure that:-

- A roof pole is used to operate a sliding roof
- The trailer / swap body / container has been swept out
- The inside of the trailer / swap body / container is clean, dry, tidy, odourless and there are no rips in the canopy or curtains
- There are no holes in the floor or nails protruding from the bed of the trailer
- There are no visual signs of general damage
- Straps, boards and sealing cords are in place and usable

4. Load Securing Equipment

- Driver should have a minimum of 12 straps. These must be LC2000daN and comply with EN12195-2. Straps should be in good condition.
- Edge protection must be used with straps on all sharp or exposed edges.
- It is recommended that anti-slip matting is carried and placed between the trailer bed and the load
- Additional load securing equipment may be required if specified by a customer

5. Loading and Unloading

5.1 At the customer's premises

Before arriving at the customer's premise drivers shall check with their planner to see if there are special instructions to be followed.

When working at Customers sites:-

- Children, unauthorised passengers, animals must not be taken on to customers sites
- Alcohol or drugs must not be taken on to or consumed on customer's sites
- Drivers should only smoke in designated areas
- Speed limits must be obeyed
- Rail traffic has priority

- Driver must make use of the sanitary facilities (WC) and rubbish facilities provided on sites
- Drivers must obey all other rules communicated at the site
- Drivers should not open their roof or curtain, or remove their load restraint until directed to by the customer.

If when working on customer sites, drivers identify any issues that they consider affects their ability to work safely they should report them to their Planner.

5.2 Courtesy

When in contact with the customer, drivers should:

- Always be polite and helpful.
- Avoid arguments and confrontation with the customer
- Where possible, be present during loading/unloading of the trailer.
- Refer any unreasonable requests to their planner.

5.3 Time Keeping

- Drivers are to confirm with their planner whether the collection/delivery is booked for a specific time.
- Drivers are to check delivery notes for times and any special instructions.
- Drivers must make every effort to arrive at the customer's premises at the specified time. Failure to do so can result in inconvenience to the customer, to themselves and to P&O Ferrymasters.
- If they are going to be delayed in arriving at the customer's premises for a collection/delivery, or if they are delayed at the collection/delivery point, the haulier must contact P&O Ferrymasters.

5.4 Loading

When collecting a consignment drivers should:

- before loading, check that the destination of the load and any reference numbers they have been given are the same as the customers. If there is any doubt, they should contact their Planner.
- contact their planner if the customer wants to load additional deliveries.
- check the quantity and condition of the goods where possible; if the goods are damaged they should inform the customer.
- mark the CMR e.g. 'cases broken' or 'packages damaged', if the customer loads damaged goods and inform their Traffic Office.
- mark the CMR 'driver not permitted to check quantity or condition' if it is not possible to check the goods.
- when goods are palletised, only count and sign for the number of pallets.
- seal the load and record the number on the CMR/Customer paperwork.
- ensure that both they and the customer sign and print their name on the CMR note and that the note is clear and legible.

- break the seal and reseal for groupage collections, preferably with a witness present.
- Only participate in the loading process if he has been trained to do the task

5.5 Stowing and Securing Cargo

Drivers must remember that it is a legal requirement to ensure that loads are secured. Failure to do so satisfactorily may result in a prosecution, serious injury, or even a fatality.

Drivers must:

- spread loads evenly across the trailer, ensuring that their vehicle/trailer is not overloaded on gross, or axle weights; if in doubt weigh off. Load heavy items on the bed of the trailer and lighter items on top.
- separate any goods that are likely to damage, or contaminate another consignment.
- restrain the load using straps, chains, dunnage, chocks and stanchions, as necessary.
- follow the securing method(s) best adapted to the characteristics of the cargo (locking, blocking, direct lashing, top-over lashing, or a combinations of these). Further information can be found in: 'European Best Practice Guidelines on cargo Securing for Road Transport (http://ec.europa.eu/transport/road_safety/vehicles/doc/cargo_securing_guidelines_en.pdf)
- wherever possible, use equipment which supplements the cargo securing equipment, such as anti-slip mats and edge protection.
- break the load down, or use dunnage to fill the space if there is a gap between the load and the front of the trailer and the doors.
- ensure that the securing arrangements do not damage the goods transported.
- take additional care when working at height, or are involved in manual handling activities.
- check straps, ropes, sheets, stanchions and seals are secure before resuming driving after a break, when leaving trailer at port of export and when collecting a loaded trailer.
- if there is a need to break a seal to check load security, reseal and record the new seal number on the delivery note/CMR. Wherever possible, the breaking of seals must be undertaken in the presence of a witness and reported to their Planner. Under no circumstances should drivers break customs seals.
- if there are any problems with load security, or damage, contact their Planner.

5.6 Unloading

When delivering a consignment drivers should:

- break the seal in presence of the customer.
- open the trailer with care, be prepared for any loose cargo and report any significant movement.
- if possible be present during the unloading process.
- Only participate in the unloading process if he has been trained to do the task
- count and agree the number of pallets/packages with the customer

- phone their Planner if there is any disagreement as to the number of pallets/packages.
- mark the CMR 'driver not permitted to check quantity or condition' if you are not allowed to count the pallets/packages, or verify their condition
- where the customer provides their own delivery note, use it in conjunction with the CMR note (where issued).
- get the receiver to sign the delivery note and print name; leave one copy with the receiver. Keep the signed CMR / Proof of Delivery. (POD)
- clean up any spillages before leaving customer's premises.
- rebuild trailers fully, before leaving premises.

5.7 Loading Docks

Customers may (un)load via a loading dock. A Loading Dock has several hazards associated with its operation, including a risk of drive away (vehicle leaves the loading dock too early); vehicle creep (vehicle moves from the edge of the loading dock, due to suspension or jolting); Load roll-away (the load, especially when in cages can roll within the trailer / container; Trailer tip (when the trailer / container is uncoupled from a tractor unit and the landing legs are lowered, the trailer can tip forward if too much weight is placed at the front of the trailer).

Customers will assess the risks associated with the loading dock and implement controls. These may include:-

Hazards	Control
Drive Away	Signals, signs and barriers; Key control; Airline Lock system; Loading Bay door locking system; Chocks and Other Restraints
Vehicle Creep	Dock plate markings; buffers;
Load run away	Dock levellers
Trailer tip	Trailer stabilisation; lighter loading equipment

Drivers should ensure that they know, understand and follow the procedures and controls used by a customer when (un)loading from a Loading Dock.

If the customer does not have been clear procedures, then the driver should:-

- Make sure that the loading dock is free and available before reversing
- Check with (un)loading teams that they are out of the trailer / container before pulling away from the Loading Dock
- Never start the vehicle engine or drive away using a second set of keys

5.8 Assistance with loading / unloading

Certain customers may request that the driver assists them in the loading or unloading of the trailer / container. If this is requested, then the customer should provide information, guidance and training on how the driver should assist and perform this operation. When carrying out any new operation, the driver should assess the risks for himself, briefly assessing the hazards and dangers which could cause harm and how this can be removed or avoided. If the driver feels that what he is being asked to do is unsafe, putting himself or another at the risk of harm, or injury, then they should stop and report the concerns to their Traffic Office, who in turn should report to P&O Ferrymasters.

6. Vehicle Routing

Drivers should identify and follow the optimum route between their starting and finishing points, using major roads, taking into account any vehicle bans, or restrictions, and customer instructions.

7. Parking

When parking up drivers should always:

- ensure that their vehicle is not causing an obstruction to other road users.
- where possible, park in a location that is well lit and known to be secure, preferably in a recognised lorry park ([Http://www.iru.org/transpark-app](http://www.iru.org/transpark-app))

8. Driving in inclement weather

Drivers should be aware of changing road conditions in relation to weather and drive accordingly.

9. Fatigue

Drivers should if they start to feel sleepy find a safe place to stop. It is recommended that a driver feeling drowsy consumes a strong caffeine drink, followed by a 15 minutes nap to allow the caffeine to take effect.

To combat the risk of falling asleep at the wheel drivers should:

- get adequate sleep prior to a journey
- avoid eating heavy meals before driving
- plan their journey to include adequate rest breaks
- never drive if affected by alcohol or drugs; this to include some over the counter medicines that can make you drowsy.
- maintain a plentiful supply of fresh air circulating in the cab.

10. Security

Drivers and operational staff shall be security screened in accordance with the Logistics Service Provider's recruitment and selection policy and in accordance with national legislation.

Drivers should always be mindful of security and must:

- when collecting consignments check that the goods correspond with the instructions they have been given. Additionally, they should be alert to, and wary of, any unusual packages, cargo, marks on the goods (eg. other countries mentioned as the given destination, or suspicious behaviour).
- refuse any goods/packages, additional to the load they are instructed to collect. If they receive such a request they should contact their Traffic office immediately, for them to notify P&O Ferrymasters for further instructions / relevant authorities.
- regularly check their trailer for any signs of tampering, or damage.
- check the seal number on the trailer against the one on the CMR. If the seal numbers are different then they must report this to their planner immediately.
- never leave the vehicle unlocked or the keys in the cab.
- use the vehicle immobiliser, if fitted.
- park box vans so the doors cannot be opened.
- never discuss the type of load you are carrying, or the customer you are collecting from, or delivering to over a CB, or at a Truckstop etc.
- check seal integrity after every break in a journey.
- If they suspect the trailer has been tampered with, or that there is something suspicious with the trailer or the load then please report this to their Planner and authorities, as necessary
- If they witness someone acting suspiciously in or around a trailer park or parking location, then report this to their Planner and the authorities, as necessary. Also take defensive action, potentially moving to a more secure parking place.

Hijacking is a risk and can be minimised by drivers:

- locking cab doors.
- being mindful of any bogus officials, or consignees.
- being suspicious of anyone following them, either on foot e.g. when returning to their vehicle, or on the road.
- being wary of any route / destination changes notified to them by anyone other than their planner.

11. Illegal Immigrants to UK

The Immigration and Asylum Act 1999 in the UK states that anyone found bringing a clandestine entrant into the UK is liable for a penalty of up to £2000 per immigrant (The Prevention of Clandestine Entrants: Code of Practice).

Drivers must ensure that all precautions are taken to prevent this happening:

- Plan their journeys to avoid rest breaks or overnight stops within 150km radius of the port of embarkation to the UK, unless in secure parking.
- Inspect trailer for signs of tampering, damage or other signs of potential illegal entry.
- Apply padlocks at point of loading

- Check seals, sealing cords are intact and numbers are correct.
- Check all other potential hiding places including under the trailer, external storage compartments, tool boxes and wind deflectors.
- Listen for any sounds that may indicate the presence of an unauthorised person.
- Avail yourself of any independent system of checking at the Port of Embarkation, e.g. CO₂ check.
- Record all checks made on a check list. <https://www.gov.uk/government/publications/vehicle-security-checklist>
- More information is available from: <https://www.gov.uk/guidance/secure-your-vehicle-to-help-stop-illegal-immigration>

12. Transport of Dangerous Goods

Hauliers and their drivers involved in the carriage of regulated dangerous goods must comply with all national and international regulations for the transportation of such goods.

In particular, drivers must:

- hold a valid ADR licence, with the appropriate classes, for the goods to be carried.
- ensure that their vehicle is correctly equipped and that they have the appropriate Personal Protective Equipment (PPE) for regulated dangerous goods movements.
- have in their possession Instructions in Writing as an aid during an accident/emergency situation that may occur, or arise during carriage. These instructions shall be provided by the haulier to their driver, ensuring that each driver understands and is capable of carrying out the instructions properly.
- ensure that they have necessary documentation and display the appropriate labelling on their vehicles.
- comply with route, tunnel, or parking restrictions.

Hauliers who are involved in the carriage of dangerous goods packed in limited quantities are responsible for ensuring their drivers have been trained in the requirements governing the carriage of such goods, appropriate to their responsibilities and duties.

13. Transport of Packaged Food related Products and Food Grade Packaging

General

The movement of Food related products and packaging requires special attention.

All trailers

- Foodstuffs must be segregated from any non 'food-safe' products (such as Dangerous Goods), where there is a possibility of cross contamination.
- Drivers Hygiene Rules.
Drivers must:

- Make sure clothing / workwear is clean and appropriate.
- Make sure hands are washed before they come in to contact with the products.
- Do not wear any visible jewellery when loading, unloading, or in contact with foodstuffs.
- Regularly inspect soles of shoes, or boots for embedded glass, or plastic particles to ensure they are not transferred into the trailer / container.
- Glass or hard plastics
 - It is strictly forbidden to take glass, or hard plastics (eg. bottles, glass, or plastic cups) into Trailers / Containers. Broken glass, or hard plastic could contaminate the products being carried. Damage to cargoes, where glass, or hard plastic has been used as packaging must be reported immediately. Trailer to be thoroughly cleaned internally prior to collecting next load of foodstuffs.
- Before Loading

Drivers must:

 - Check the condition of the trailer
 - Check trailer floor is swept and clean
 - Check there are not any odours
- At Loading Point

Drivers must:

 - Not smoke, eat or drink whilst loading or unloading the trailer / container
 - Not use Snap off blade knives inside the trailer / container
 - Report broken or pallets in poor condition (wood or plastic) at loading point.
 - Put a seal, or lock on the Trailer / Container when loaded and record the seal number on the CMR, as per client instructions
- At Delivery Point

Drivers must:

 - Remove seal in presence of customer.
 - Report product damage immediately to P&O Ferrymasters. Do not leave the customer's premises before notification.
 - Ensure receiver signs delivery documentation / CMR. If 'claused' report to your Traffic Office / P&O Ferrymasters.
 - Delays during loading, unloading, or during your journey must be notified to the Traffic Office / P&O Ferrymasters.

Refrigerated Trailers

- The temperature at which the cargo is to be transported is often crucial, therefore you must make sure that the driver has this information prior to loading the trailer.
- The driver is responsible for setting the correct temperature within the trailer.
- If you have any concerns over the functioning of the refrigeration unit the driver should contact the Traffic Office immediately, as there is considerable risk to the cargo.
- Check that there is sufficient fuel in the tank on the Reefer trailer / container.
- The temperature setting on your trailer must be checked and recorded during the whole journey, with a maximum interval of every 3 hours. There must be a method of logging this temperature.
- Before leaving a trailer / container, check if the set temperature is the correct one and cross reference with the inner temperature of the trailer / container. The two must match.
- Check refrigeration unit is fully functioning and that the temperature is at the required level prior to loading.
- Check whether the temperature of the loaded goods is as advised. If there is a discrepancy report this to P&O Ferrymasters.
- Report temperature deviations immediately to P&O Ferrymasters. Do not leave the customer's premises before notification.
- Data Logging Equipment reports must be retained and easily retrievable, and available, on arrival, or on the next working day. Temperature controlled units fitted with continuous recording devices must have an alarm and monitoring system, which can notify in the event of failure.

14. Defensive Driving

One of the most effective ways of avoiding accidents is to drive defensively, often known as 'Defensive Driving'.

This is a reduced risk driving strategy designed to develop driver's skills in identifying risks, by increasing their awareness of hazards and developing a safer attitude to their driving by linking risk to accident potential. Drivers are encouraged to use the following defensive driving techniques:

Driver attitude

Drivers often express how they feel in the way they drive, and this can be very dangerous. Drivers who have been in an argument tend to drive more aggressively, too fast, and too close to the vehicle in front. This greatly increases their chances of having an accident.

If you recognise this as a problem that also applies to you, find ways of coping with stress as one way safeguarding your safety and that of others on the road.

On the plus side a positive attitude can help to reduce the risk of accidents on the road, you should aim to:

- Be tolerant and considerate towards others on the road.
- Have a realistic appraisal of your own driving abilities.
- Have a high degree of care for your own safety and that of others.

Pay attention

Concentrate on your driving and be alert; try to gather as much information as possible about everything around you. This alone will reduce your accident potential by over 50%.

Learn to recognise and respond to hazards

A hazard is 'anything containing an element of risk, or potential risk'.

Watch your speed

The speed at which you drive is one of the most important factors in contributing towards an accident. The faster you go, the less chance you have of avoiding an accident, as ultimately you have less time to react.

On the other hand driving too slowly could make you an obstacle to safe traffic flow.

Obey speed limits and drive at a speed that is safe and sensible for the conditions.

Work on developing your visual search skills

There is little to be gained from passive observation of the road ahead. You should be mentally responding to what you see, assessing risks and predicting dangers. This is essential to glean advance information of potential problems ahead in order to avoid late, uncoordinated action in an emergency. For example:

Will children emerge from behind that ice cream van?

Are the traffic lights about to change?

Is a car about to pull out that junction?

Eye movements of experienced drivers tend to be very rapid, moving from one point of critical interest to another, to check and recheck areas of risk. This is known as 'visual scanning'

Through visual scanning you should:

- **Keep the eyes moving** – avoid staring at one object far too long.
- **Get the big picture** – be aware of the information being fed to you about your environment through your peripheral vision.
- **Make others see you** – through lights/horns/indicators and other signals.
- **Plan your escape route** – always have alternative escape route in mind if you have to take an emergency action to avoid an accident.
- **Look ahead to steer** – look in the direction you want to go and your arms will automatically try to steer you in that direction.

Make good use of your mirrors

Your mirrors are an essential safe driving aid, which many drivers often forget to use. It is essential to:

- make sure that your mirrors are undamaged, clean and are properly adjusted.
- make sure that you use your mirrors before changing course or speed and before overtaking.

Keep your distance – Hold Back

This is a very useful safety tool and involves actively reducing speed and holding back to allow you to look, assess, and decide on what action to take in response to road conditions ahead. The safety cushion this provides allows you time to decide on the safest form of appropriate action.

Don't Take Risks

The advice here is simple: 'If you're not sure, don't'. It could make the difference between life and death.