

# SYDNEY CHARTER BUS AUSTRALIA

Sydney Charter Bus Pty Ltd (ABN: 44 134 888 912)

## Environmental & Sustainability Policy

CLIENT DISCLOSURE DOCUMENT

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<b>Prepared By</b>	Operations Management — Sydney Charter Bus Pty Ltd
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### 1. PURPOSE & POLICY STATEMENT

Sydney Charter Bus Pty Ltd (trading as Sydney Charter Bus Australia) is committed to the responsible stewardship of the natural environment across all transport operations undertaken within New South Wales and elsewhere as applicable.

This Environmental & Sustainability Policy ("the Policy") formalises the Company's obligations, operational controls, and governance arrangements pertaining to environmental performance. It is issued in accordance with the NSW Bus Operator Accreditation Scheme (BOAS) and is integrated into the Company's Safety Management System (SMS) in compliance with the BOAS SMS Handbook, Version 4 (January 2024).

#### Policy Objective

To embed environmental responsibility into every level of the Company's operations — from fleet management and maintenance through to driver conduct and client engagement — with the aim of continuously reducing the Company's environmental footprint whilst maintaining safe, reliable, and compliant transport services.

### 2. SCOPE OF APPLICATION

This Policy applies, without limitation, to all persons and activities associated with Sydney Charter Bus Pty Ltd operations, as detailed below:

Subject	Scope of Application
Personnel	All directors, employees, drivers, contractors, and subcontractors engaged by the Company in any capacity
Fleet Assets	All Company-owned, leased, and subcontracted passenger transport vehicles

Operational Activities	All on-road services, depot operations, scheduling, and administrative functions
Service Categories	Charter transport, corporate transfers, government contracts, and school services

### 3. LEGISLATIVE & REGULATORY COMPLIANCE FRAMEWORK

The Company operates in strict accordance with all applicable environmental and transport legislation. The following instruments constitute the primary compliance framework governing this Policy:

Applicable Instrument	Nature of Obligation
Protection of the Environment Operations Act 1997 (NSW)	Primary environmental protection legislation governing pollution prevention and operational conduct
Heavy Vehicle National Law (HVNL)	National regulatory framework for heavy vehicle safety, maintenance, and compliance
NSW Bus Operator Accreditation Scheme (BOAS)	State accreditation scheme regulating bus operator standards, including SMS requirements
EPA Emissions Standards & Guidelines	Prescriptive standards for vehicle exhaust emissions applicable to the Company's fleet

This Policy is implemented in conjunction with the Company's SMS, incorporating risk identification, vehicle inspection protocols, incident reporting, and corrective action processes as mandated under BOAS requirements.

### 4. ENVIRONMENTAL COMMITMENTS

Sydney Charter Bus Pty Ltd formally commits to the following principles as the foundation of its environmental management:

Commitment Area	Statement of Commitment
Emissions Reduction	Operate and maintain a Euro 5 compliant fleet to minimise nitrogen oxide (NOx) and particulate emissions in accordance with applicable EPA standards
Fuel Efficiency	Implement structured operational controls to optimise fuel consumption and reduce unnecessary engine operation
Pollution Prevention	Prevent environmental contamination through proactive maintenance, compliant waste disposal, and incident response protocols
Continuous Improvement	Review environmental objectives annually and adopt emerging technologies and best practices where commercially and operationally viable
Stakeholder Engagement	Actively promote group transport and sustainable mobility solutions to clients, contractors, and government stakeholders
Resource Efficiency	Minimise waste generation and adopt responsible procurement practices throughout Company operations

## 5. FLEET MANAGEMENT & EMISSIONS CONTROL

### 5.1 Fleet Standard

The Company operates an exclusively Euro 5 compliant fleet, meeting stringent European emissions standards for NOx and particulate matter. Fleet allocation prioritises newer, lower-emission vehicles for long-distance and high-utilisation charter engagements.

### 5.2 Scheduled Maintenance Programme

All vehicles are maintained in accordance with a structured preventative maintenance programme aligned with BOAS SMS and Heavy Vehicle Inspection Scheme (HVIS) requirements. Emissions-related maintenance activities include, but are not limited to:

Maintenance Activity	Description & Frequency
Engine Diagnostics & Tuning	Scheduled and fault-triggered diagnostic checks to ensure optimal engine performance and emissions compliance
Exhaust System Inspection	Periodic inspection of exhaust components to detect deterioration, leaks, or emissions system faults
Fuel System Efficiency Checks	Assessment of fuel delivery systems to identify and rectify inefficiencies impacting consumption and emissions
Fluid Integrity Inspection	Immediate rectification of identified oil, coolant, or fuel leaks to prevent environmental contamination

## 6. FUEL EFFICIENCY & OPERATIONAL CONTROLS

The Company implements the following operational measures to reduce fuel consumption and associated emissions across all services:

Operational Control	Implementation Measure
Route Optimisation	Journey planning processes are employed to eliminate unnecessary travel distances and reduce total vehicle kilometres operated
Idle Reduction	Drivers are trained and required to minimise engine idling at all times; enforcement is embedded within the Company's SMS driver conduct obligations
Load Management	Efficient passenger and vehicle load management is applied to maximise transport yield per trip and reduce per-capita emissions
Congestion Avoidance	Scheduling practices are designed, where practicable, to avoid peak traffic periods and high-congestion routes
Driver Conduct Standards	Drivers are contractually required to operate in a fuel-efficient manner, avoiding excessive acceleration, harsh braking, and unnecessary ancillary system use

## 7. WASTE MANAGEMENT & HAZARDOUS MATERIALS

All hazardous waste generated through vehicle maintenance and depot operations is managed in strict compliance with applicable environmental legislation and Company protocols:

Waste Category	Disposal & Handling Requirement
Used Oils & Lubricants	Collected and disposed of by EPA-licensed waste contractors in accordance with the Protection of the Environment Operations Act 1997
Vehicle Batteries	Handled and recycled through accredited battery recycling programmes in compliance with product stewardship obligations
Filters & Mechanical Waste	Segregated and disposed of via licensed waste streams; no landfill disposal of regulated materials is permitted
Fuel & Chemical Spills	Immediate response protocols activated; incident recorded in the SMS Risk Register and reported in accordance with regulatory obligations

### Resource Efficiency Measures

The Company supplements its hazardous waste controls with broader resource efficiency initiatives, including: digital documentation systems to reduce paper consumption; depot recycling programmes; environmentally responsible procurement; and the progressive elimination of single-use materials from operational activities.

## 8. ENVIRONMENTAL RISK MANAGEMENT (SMS INTEGRATION)

Environmental risk is formally integrated into the Company's Safety Management System. The following framework governs the identification, assessment, control, and review of environmental hazards:

SMS Process Element	Environmental Application
<b>Risk Register</b>	All identified environmental hazards — including fuel spills, excess emissions, fluid leaks, and waste disposal incidents — are recorded and assessed in the Company's Risk Register
<b>Hazard Identification</b>	Systematic identification of environmental hazards is conducted as part of ongoing operations reviews, maintenance schedules, and incident investigations
<b>Corrective Action</b>	Environmental incidents trigger a documented corrective action process, including root cause analysis, remediation, and preventative control implementation
<b>Incident Reporting</b>	Environmental incidents are reported, investigated, and reviewed in accordance with BOAS SMS requirements and applicable statutory reporting obligations
<b>Review &amp; Monitoring</b>	Environmental risk controls are subject to periodic review as part of the Company's broader SMS performance monitoring cycle

## 9. TRAINING, AWARENESS & COMPETENCY

The Company ensures that all personnel engaged in operations maintain appropriate awareness of their environmental responsibilities through structured training and induction:

Training Component	Delivery & Scope
Driver Induction	Environmental awareness, fuel-efficient driving techniques, and spill response procedures are incorporated into all new driver induction programmes
Ongoing Training	Refresher training on environmental obligations and emerging best practices is delivered periodically to all operational staff
Spill & Incident Response	All relevant personnel are trained in environmental spill response procedures and incident reporting obligations under the SMS
Contractor Compliance	All contractors and subcontractors engaged by the Company are required to acknowledge and comply with this Policy and the Company's SMS standards

## 10. ROLES, RESPONSIBILITIES & ACCOUNTABILITY

Accountability for environmental performance is assigned across all levels of the organisation as follows:

Organisational Level	Primary Environmental Responsibilities	Accountability
Directors & Management	Overall environmental compliance; policy approval and review; strategic investment in fleet and technology	Ultimate accountability for all environmental obligations
Operations Team	Fleet allocation to sustainability objectives; route and scheduling optimisation; contractor compliance oversight	Day-to-day operational environmental performance
Maintenance Personnel	Environmentally compliant vehicle servicing; hazardous waste management; spill prevention and response	Maintenance-related environmental controls and reporting
Drivers	Fuel-efficient vehicle operation; adherence to idle reduction requirements; prompt reporting of mechanical deficiencies	Individual conduct obligations under SMS and this Policy
Contractors	Compliance with this Policy and all SMS environmental requirements as a condition of engagement	Contractual compliance with Company environmental standards

## 11. CLIENT & STAKEHOLDER COMMITMENTS

Sydney Charter Bus Pty Ltd actively supports its clients' sustainability objectives by providing environmentally responsible transport solutions. The Company's commitments to clients include:

### Our Commitment to You

We provide exclusive access to a Euro 5 compliant, low-emission charter fleet — offering a demonstrably sustainable alternative to multiple private vehicles. Our operations team works collaboratively with clients to optimise transport planning, reduce unnecessary vehicle movements, and support corporate, government, and institutional sustainability reporting requirements.

## 12. CONTINUOUS IMPROVEMENT & POLICY REVIEW

Review Mechanism	Detail
<b>Annual Policy Review</b>	This Policy is reviewed no less than annually by senior management to assess performance, incorporate legislative changes, and update operational controls
<b>Emissions &amp; Fuel Monitoring</b>	Fuel consumption and emissions data are monitored on an ongoing basis to identify improvement opportunities and benchmark fleet performance
<b>Fleet Upgrades</b>	The Company's fleet renewal strategy is aligned with evolving emission standards and the progressive adoption of lower-emission vehicle technologies
<b>SMS Integration Reviews</b>	Environmental performance outcomes are incorporated into periodic Safety Management System reviews as mandated under BOAS requirements
<b>Legislative Monitoring</b>	The Company actively monitors changes to applicable environmental and transport legislation to ensure ongoing compliance
<b>Trigger-Based Review</b>	An unscheduled review is initiated upon any material change to legislation, accreditation requirements, fleet composition, or operational scope

### Policy Declaration

Sydney Charter Bus Pty Ltd is committed to conducting its transport operations in a manner that respects and protects the natural environment. Through a Euro 5 compliant fleet, a structured Safety Management System, and a culture of accountability at every level of the organisation, the Company upholds its obligations to clients, regulators, and the broader community.

Authorised by: Colin Christian

Title: Operations Manager

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