

DRIVER SAFETY

manual





INTRODUCTION

This manual is designed to provide ECF's customers' drivers with safe work rules, policies, and procedures. ECF is committed to helping you and your employees conduct all operations in a manner that protects and preserves employee safety, health, security, and the environment. This means strict compliance with applicable safety and environmental protection laws and the everyday work practices that eliminate incidents, improve efficiencies, and reduce costs.

Please read this carefully and keep it handy for future reference.

Working together, we can eliminate incidents and create a workplace that provides the highest level of safety, security, and environmental protection.

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SUMMARY

ACKNOWLEDGEMENT RECEIPT



COMPANY POLICY

Safety, health and security are key business objectives. It is our belief that every collision, injury, and security incident is preventable. Having a current and valid driver's license as well as working safely and responsibly is a condition of employment.

Employees at all levels of the organization are responsible and accountable for safely performing all work operations and protecting employees, customers, assets, and the general public.

Building and maintaining a culture that is committed to safety, health, security, and environmental protection will help us:

- Minimize or prevent personal injury, occupational disease, property damage, and/or damage to the environment.
- Meet applicable federal, state, and local regulations and exceed those requirements where the business warrants it.
- Reduce costs associated with injuries, collisions, theft, and future environmental clean up liability.
- Improve worker productivity and morale.
- Promote a socially responsible image to the public and our customers.
- Ensure that all company assets, employees, and intellectual property are adequately protected.

DRIVER RESPONSIBILITY

Your attitude and work practices go a long way toward creating a safer workplace and achieving environmental objectives and targets. You have a responsibility to yourself and to your co-workers to perform every work assignment in a safe and secure manner while being supportive of the company's environmental policy.

As a driver, you have a responsibility to:

- Must follow all traffic laws
- Help all newly hired employees understand the importance of driving and working safely.
- Observe all safety rules, safe driving guidelines, and safety and security-related work procedures at all times.
- Report and/or correct any work-related hazards immediately.
- Report and correct any environmental problems immediately.
- Report all hazardous roadways and conditions that may affect you or other drivers.
- Report all accidents, injuries, collisions, unsafe conditions, or unusual occurrences immediately to your supervisor.
- Properly use appropriate personal protection equipment, tools, machinery, or vehicles.

- Practice good housekeeping in your facility or vehicle.
- Suggest safety and environmental protection improvements where needed.
- Support company established environmental policies and programs.
- Participate in safety and health committees, safety meetings, training sessions, and inspections as appropriate.

Safety, health, and security activities are an important part of the work environment and must be integrated into your daily work operations. Collisions, injuries, and harm to the environment can be prevented if safety, health, security, and environmental standards and procedures are properly followed.

We view outstanding safety, health, security and environmental performance as a mark of employee quality and skill.

RISK ASSOCIATED BEHAVIOR

Sub-standard safety and health performance (risk-associated behavior) can result in collisions and injuries. Risk associated behavior is not tolerated. Working safely is a condition of employment.

An employee's behavior is considered risk-associated when the:

- Employee's safety training and knowledge of the company safety procedures and government regulations are documented
- Employee violates these procedures in such a manner that the violation increases the risk of preventable injuries, illnesses, and collisions.

CORRECTIVE ACTION

When a company manager determines that an employee has engaged in risk associated behavior, management must take corrective action for the safety of all employees and the public.



Important: Corrective actions must be uniform for violations resulting in collisions, injury or illness and those in which no collision, injury or illness occurred. The primary purpose of the corrective action is to prevent future occurrences of risk associated behaviors and is not to penalize the employee for having a collision or injury.

The extent of corrective action depends upon whether it is the employee's first, second, or third violation of risk-associated behavior within a rolling three year period. Any combination of risk-associated behavior related to non-compliance of company procedures, related government regulations, preventable collisions, or moving violations must be considered cumulatively for the purpose of determining the appropriate corrective action.

The following table provides guidelines for corrective action for first, second, and third incidents involving risk-associated behavior.

NO. OF INCIDENTS IN A ROLLING THREE YEAR PERIOD	CORRECTIVE ACTION
First	<ul style="list-style-type: none"> • Provide verbal counseling on how risk-associated behavior could have been prevented • Document the counseling in a letter to the employee and place it in his or her personnel file. • Provide remedial education and training to ensure the employee understands safe work practices. The remedial training should be provided immediately. If more extensive training is required, the training should be done within 14 days of counseling
Second	<ul style="list-style-type: none"> • Suspend the employee without pay for a period of three days • Issue a warning letter to the employee. Inform the employee that additional disciplinary action, up to and including termination, can result from future risk associated behavior • Require that the employee attend additional remedial training to correct the risk associated behavior and provide the manager with an action plan to eliminate risk associated behavior
Third	<ul style="list-style-type: none"> • Terminate the employee

Note: Always consult with Human Resources prior to initiating any of the above Corrective Actions. Management has the discretion to deviate from these steps if the behavior is serious in nature and creates an imminent hazard to employees or others.

CAPTAIN OF THE SHIP PHILOSOPHY

We empower every driver to act as “Captain of the Ship,” when immediate action is required to correct potentially unsafe conditions or situations. This means that drivers have both the right and responsibility to stop any work or activity, including driving duties, when they are unable to proceed safely. They have the right to do this without fear of retribution. Management will be supportive and will not pressure drivers to take unsafe risks.

Drivers are expected to take whatever actions are required to correct potentially unsafe conditions or situations when time does not permit resolution through normal levels of responsibility, as described in this policy.

Drivers are responsible for determining their general ability to work or drive safely. If conditions are or will prevent a driver from completing a task safely, they should notify their supervisor immediately and determine a proper and safe solution. Unsafe conditions may include bad weather conditions, driver fatigue, illness, or equipment failure.

Be aware that weather conditions sometimes change and improve rapidly. Therefore, drivers may be temporarily delayed in departing, depending on existing or continuing conditions. Drivers should report to their work location and decisions will be made regarding safe dispatch or operations.

Note: If a driver decides to proceed under unsafe conditions, you may be held personally accountable for unsafe work practices or operating a vehicle during unsafe conditions.

If a driver has any questions, needs guidance, or clarification on the details of this policy, please contact a supervisor.



SAFETY RULES

GENERAL

Drivers are expected to work accident, collision-and injury free. Working safely is a "condition of employment." Drivers should:

- Come to work well rested. Driver fatigue is a major contributing factor in many collisions.
- Be familiar with your location's emergency action plans. All drivers must meet with their supervisor to review their locations and/or vehicle's safety work rules, building evacuation procedures, location of emergency/first aid equipment, and related procedures.
- Know the emergency contact phone numbers for your location's doctor, fire department, police department, and your supervisor. Contact information should be posted by the telephones in all facilities and issued to all drivers.
- Know the location of fire extinguishers and fire protection equipment in your work facility or vehicle. If you are unfamiliar with its use, ask your supervisor for instructions.
- This is a no smoking work environment. Comply with all "No Smoking" rules and smoke only in designated exterior areas.
- Walk only in designated pedestrian walkways, when available. Always look where you are stepping. Be alert for changes in elevation, spills, or other tripping hazards.
- Attend all employee/driver safety meetings, training sessions, or committee meetings as directed.

DRIVING POLICY

We are committed to safety, service, and quality for both our employees and customers. Drivers are to operate company-owned leased or rented vehicles in accordance with the Driving Policy.

This company requires all drivers to operate company-owned, leased, or rented vehicles in a safe and economical manner following the policy outlined below:

- Company-owned, leased or rented vehicles are to be used solely for official company business. **Unauthorized use is grounds for immediate termination.**
- Vehicles are not to be operated unless they are in a safe operating condition.
- Drivers must be physically and mentally able to drive safely.
- Drivers must be licensed, qualified, and approved to operate specific types of equipment.
- Drivers must conform to all traffic laws and must maintain a safe speed and following distance, with allowances made for adverse weather and traffic conditions.
- Drivers must respect the rights of other drivers and pedestrians.
- Drivers may not use drugs or alcohol prior to, or while operating a company-owned, leased or rented vehicle.

SAFE DRIVING TECHNIQUES

- Drivers/employees must operate company vehicles safely, observing regulatory signs and traffic safety controls.
- Stay on your approved and authorized route. Route deviations are costly and expose you to known and unknown hazards.
- Drive with both hands firmly gripping the steering wheel (generally in the 10 and 2 o'clock positions). This will help to maintain control of the vehicle if you should incur a front axle tire blowout.
- Aim high. Look ahead 12-15 seconds or approximately quarter of a mile on the open road. In urban areas, look ahead two blocks. Being alert and looking ahead in the distance allows you to see everything in front of your vehicle, and to plan and react accordingly.
- Keep your eyes moving. Scan your mirrors every three to five seconds and never focus or stare at a single object for more than two seconds. Your vehicle is capable of traveling great distances while you are distracted.
- If sunlight glare or other intense light is limiting your vision, clean your windshield, use your sun visor, and consider wearing sunglasses. Avoid looking directly at the light source and try to focus temporarily on the lane lines/markers.
- All posted speed limits must be obeyed. Deliberately operating your vehicle in excess of this limit, tampering with the governor and/or facilitating adjustment of the governor will result in disciplinary action, up to and including termination.
- Operating speeds should always be adjusted and consistent with existing conditions, such as lighting, traffic, road and weather conditions. Never overdrive your personal line of sight. Drive at speeds that will allow you to come to a controlled stop within the area you can see.
- Posted speed limits are for optimum conditions, such as daylight, clear field of vision, clear weather, straight road, no construction, and/or light traffic. Incrementally decrease your speed as conditions deteriorate.
- Never over drive your headlights. Over driving your headlights means driving at speeds where you can't see upcoming road hazards because your stopping distance is greater than the effective illumination of your headlights.
- Engage turn signals for a minimum of three flashes and re-scan your mirrors a final time to ensure clearance prior to changing lanes, merging, or turning.
- If faced with lane encroachment where there is potential impact from opposing traffic, always first look to go right in a "controlled and slowing maneuver." Use caution to remain on the roadway. Be aware that going to the left may expose you to opposing head-on impact and the lane that the opposing vehicle would be trying to return to.
- Approach intersections prepared to stop within the available sight distance, allow cross traffic to clear no matter if you have the right of way or not. Be established in the proper lane and do not change lanes while crossing intersections. Look left, right, left, and then right again before entering the intersection.



- When making right and left turns, signal your intentions early and position yourself in the most right hand turn lane available. If going right, control traffic access to your right between you and the curb. When going left, stay in your lane and closely monitor traffic from your left.

DISTRACTED DRIVING

Accident reports conclude that on average, 80% of all collisions and 68% of all rear-end collisions are caused by distracted driving.

Below is a list of the Top 10 Driving Distractions. While driving, avoid:

1. Using your cell phone to talk or text
2. Programming your GPS
3. Eating
4. Adjusting the radio
5. Retrieving items from the floor or back seat
6. Lighting/smoking cigarettes while driving
7. Engaging in a conversation with passengers
8. Reading billboards or outdoor signs
9. Gawking at accidents
10. Communicating/waving to known pedestrians

TRANSPORTATION OF HAZARDOUS MATERIALS

Drivers are responsible for understanding and complying with the Department of Transportation (DOT) regulations governing the transportation of hazardous materials.

Regulations require that drivers are able to:

- Recognize hazardous materials and the hazards associated with the material or its packaging.
- Check the accuracy of labels and markings on hazardous material items and bills of lading.
- Identify the correct placard required for the load.
- Understand and use emergency response information.
- Determine if the load is properly secured and ready for transportation.
- Explain the method of securement that is appropriate for the particular material being transported.
- Protect themselves and others in the event of an emergency.

Federal law requires that employees involved in the transportation of hazardous material receive the required training prior to their initial assignment and every three years thereafter.

FIREARMS / WEAPONS

To ensure that we maintain a workplace safe and free of violence for all employees, customers and guests, the company prohibits the possession or use of weapons on company premises or property, including company-owned, leased, or controlled vehicles, except where allowed by law.

Weapons include, but are not limited to, firearms, explosives, knives and other weapons that could cause harm.

Note: Any employee in violation of this policy will be subject to disciplinary action, up to and including termination.

FATIGUE MANAGEMENT

No driver shall operate a vehicle on company business, and management shall not knowingly require or allow an employee to operate a motor vehicle if the driver's ability or alertness is impaired from fatigue, and potentially unsafe to operate a motor vehicle. The company's "Captain of the Ship" philosophy applies to fatigue management.

Note: Failure to comply with this policy will result in disciplinary action up to and including termination of employment.

DRIVER REQUIRED REPORTING

In addition to prompt reporting of all accidents, collisions, work-related injuries or unsafe conditions, drivers are required to report the following occurrences to their supervisor/manager within 24 hours:

- Receipt of any traffic citation (personal and/or company vehicle)
- Conviction of any traffic violation
- Suspension, revocation, or cancellation of a driver's license or loss of the right/disqualification to operate a commercial motor vehicle
- Receipt of any roadside inspection, regardless of the outcome

If receipt is not provided at the scene, request the inspector's business card and/or inspection case number in the event your supervisor decides to make an official follow-up inquiry.

Note: Failure to promptly report these to your supervisor will result in disciplinary action, up to and including termination.

INJURIES AND ILLNESSES

All work-related injuries must be reported immediately to your supervisor. Failure to do so in a timely manner may result in disciplinary action, up to and including termination.

If you are ill, do not report to work. Contact your supervisor in advance of your scheduled work time. If you become ill during your work shift, report this to your supervisor immediately.

COLLISIONS

A collision is defined as any occurrence involving a motor vehicle driven by an employee on company business, which results in death, injury, or property damage, unless the vehicle is properly parked.

If a collision occurs:

- Get safely off the road, turn your vehicle ignition off, give or receive emergency medical care (if qualified), secure the scene, notify local authorities.
- Complete the accident procedures. .
- Report the collision to your supervisor immediately, **including accident report**. Failure to provide timely supervisory notification may result in disciplinary action, up to and including termination. The supervisor may direct you to make other notification/ support phone calls as necessary.
- Photos of the scene should be taken as soon as possible. Include all of the vehicles involved (damage details, four sides, license tag, and vehicle number), property damages, the roadway and any skid marks, spills or debris, traffic controls, and the roadway approaching the point of impact.
- Obtain witness names, addresses, and phone numbers. Make note of any bystanders, stopped vehicles, and tag numbers.
- Obtain and provide a valid driver's license, vehicle registration, and insurance

documents.

- Drivers, employees, and supervisors should exercise professional restraint following a collision. Never admit guilt, negligence, or speculate on the causes. Discuss the details only with the investigating authorities, managers, or other verified representatives approved by the company.
- Do not talk to the media – if you are approached for comment, refer them to the company's Corporate Communications department, or your supervisor.
- Regulatory required post-collision alcohol and drug testing will be performed as soon as possible if the collision results in a fatality, or if our driver receives a citation coupled with either emergency medical treatment away from scene or a vehicle being towed.
- It will be investigated and reviewed thoroughly to determine the root cause, preventability, and to ensure that appropriate preventive follow-up actions are taken.
- It will be considered preventable when the results show that the driver failed to prevent the collision by anticipating hazards, the unsafe actions of others, or not applying appropriate defensive driving methods.
- If the collision is determined to be preventable, it will also be considered Risk Associated Behavior (RAB). RAB is defined as sub-standard safety performance by an employee resulting in injuries and collisions.

Note: Working safely is a condition of employment.

MINOR COLLISIONS

“Minor” preventable collisions (involve some bumps and bruises but no major damage or injuries) occurring within a rolling 36-month period will result in the following corrective disciplinary actions against the responsible employee:

- **1st Offense** – Counsel, written reprimand, perform remedial training, and satisfactory check ride required
- **2nd Offense** – 3-day suspension, written reprimand, remedial training, satisfactory check ride, and employee action plan
- **3rd Offense** – Termination

MAJOR COLLISIONS

“Major” collisions involve any of the following:

- Fatality
- Emergency medical treatment away from the scene
- Damages exceeding \$30,000

Major collisions determined to be “preventable” will result in employee termination. The involved driver has the right to request a formal collision review board within three days of receiving the preventability decision. If drivers have questions, they should review the details with their supervisor.

Collisions will be considered “non-preventable” if the driver applied appropriate defensive driving techniques, controlled the vehicle by making allowances for road, traffic and weather conditions, and took the necessary precautions and actions to avoid the collision.

**BE SAFE.
DRIVE SMART.**

DRIVER HEALTH RULES

DRUG AND ALCOHOL POLICY

We strive to maintain a workplace free from the effects of substance abuse. It recognizes that drug and alcohol abuse, which impairs judgment and significantly increases the risk of injury, may pose a direct and significant threat to safety, and to the goal of a productive and efficient working environment.

This Drug and Alcohol Policy, which is applicable to all employees in the United States, is a vital policy and all employees will be held accountable for ensuring compliance.

The term “employees” includes all regular full-time, regular part-time, temporary, casual, and leased or contract employees. Contract and supplier personnel are expected to abide by our company’s rules regarding the use and abuse of illegal drugs and alcohol while on our premises or while performing any work for our company but will be referred to their own employers whenever testing is indicated.

Note: Employees subject to the Department of Transportation’s (DOT) rules on drug and alcohol abuse (through regulations enforced by the Federal Motor Carrier Safety Administration (FMCSA) and/or the Federal Transit Administration (FTA) must also comply with our company Drug and Alcohol Policy.

We reserve the right to revise this policy at any time.

Our company will comply fully with federal, state and local regulations on drug abuse and alcohol misuse.

All candidates for employment must successfully complete a post-offer, pre-employment drug screening prior to their scheduled start date and if they do not, their offer of employment will be withdrawn.

The illegal manufacture, distribution, dispensing, possession, sale, or purchase of a controlled substance is prohibited at all times. Being under the influence of alcohol or having an illegal drug in your system while on company property or while performing any work for our company is prohibited. The unauthorized use or possession of prescription drugs or over-the-counter drugs on company property is also prohibited.

A positive drug or alcohol test will be considered proof of a policy violation. An alcohol test will be considered positive if it registers .02% or more blood-alcohol. Employees who violate this policy are subject to disciplinary action, up to and including termination. Except where prohibited by law, termination is the presumed consequence of violating this policy. Contact your immediate supervisor for guidance on HR-related questions, policy violations, or complaints regarding on-the-job drug and alcohol abuse.

DEFINITIONS

Alcohol – the intoxicating agent in beverage alcohol, ethyl alcohol, or other low molecular weight alcohols, including methyl and isopropyl alcohol.

Company Property – all company-owned or leased property used by employees such as vehicles, lockers, desks, closets, and parking lots, as well as all customer worksites and delivery facilities.

Designated Employee Representative (DER) – an individual identified by the employer to receive communications and test results from service agents and who is authorized to take immediate actions to remove employees from safety-sensitive duties and to make required decisions regarding testing and evaluation processes.

Drugs/Controlled Substances – the term “controlled substances” in this policy refers to the use of any drug regulated under the federal Controlled Substances Act and includes all drugs available by prescription.

On-Duty and Duty – includes all time performing or in readiness to perform any work for our company.

Regulated Employee – an employee who performs a safety-sensitive function regulated by the FMCSA or the FTA and who is subject to regulations addressing the use of drugs and alcohol.

A driver will be considered to be performing any of the safety-sensitive functions listed previously (in this manual) during any period in which the driver is **actually performing, ready to perform or immediately available to perform** any such function.

Substance Abuse Professional (SAP) – a licensed physician, licensed or certified psychologist, social worker, employee assistance professional, state-licensed or certified family therapist, or certified addiction counselor (NAADAC, IRCC, NBCC) who also has knowledge of and clinical experience in the diagnosis and treatment of controlled substance-related disorders.

Serious Accident – any work-related accident or incident that requires any person to receive professional medical care or treatment.

DOT REQUIREMENTS

The U.S. Department of Transportation (DOT), Federal Motor Carrier Safety Administration (FMCSA), and Federal Transit Administration (FTA), acting to implement a federal law called the Omnibus Transportation Employee Testing Act, have adopted regulations requiring our company to implement an employee drug and alcohol policy for commercial motor vehicle operators and transit workers.

The regulations include prohibitions on the use of drugs and alcohol, and establish drug and alcohol testing requirements for those workers. Please refer to the DOT Regulated Workers' Drug and Alcohol Policy for guidance.

DOT REGULATED WORKERS POLICY

PROHIBITED BEHAVIORS

All company employees are prohibited from using illegal drugs whether on or off duty and may be subject to restrictions regarding their use of prescription drugs and non-prescription (over-the-counter) drugs. Employees may not use alcohol while working or while on company premises except as described below.

USE OR POSSESSION OF ILLEGAL DRUGS

The use, possession, manufacture, distribution, sale, attempted sale, or other involvement with illegal drugs by any employee is prohibited and may result in discipline, up to and including immediate termination from employment.

The use of any prescription medication that is illegal to use or possess in the United States or that is prescribed for another person is prohibited by our company policy.

The use of "medical marijuana" and synthetic marijuana is prohibited by federal law and is also prohibited by this policy. Our company will not accommodate medical marijuana use unless affirmatively obligated to do so by law.

USE OF PRESCRIPTION DRUGS

Prohibited drugs may also include prescription medications, under some circumstances.

The use of prescription medication is prohibited when:

- Medication is not prescribed for the employee.
- Employee exceeds the prescribed dosage.
- Medication causes the employee to be impaired or unfit while on duty.
- Employee is a driver or operates machinery and the directions on the medication warn user to avoid driving or operating machinery.
- Medication is not approved in accordance with DOT regulations for use while on duty. For example, the use of methadone or marijuana always disqualifies a driver from performing DOT-regulated safety-sensitive work.

Note: Prohibited use or distribution of prescription drugs will result in disciplinary action, up to and including termination.

USE OF NON-PRESCRIPTION DRUGS

The use of non-prescription (over-the-counter) medications is prohibited when:

- Medication causes the employee to be impaired or unfit.
- Employee is a driver or operates machinery and the medication directions warn the user to avoid driving or operating machinery.

The use of non-prescription drugs that contain alcohol is subject to the same restrictions our company places on the use of alcoholic beverages while working. Safety-sensitive and regulated employees must not take medications that contain alcohol within four hours before they go on duty.

Prohibited use of non-prescription drugs will result in disciplinary action, up to and including termination.

USE OR POSSESSION OF ALCOHOL

The use or possession of alcohol by any employee while on company property is prohibited and may be grounds for disciplinary action, up to and including termination.

Exception: On occasion, management may approve the use of alcohol at a company-sponsored event. Employees who choose to consume alcohol at such events are expected to exercise good judgment and refrain from becoming intoxicated or impaired.

TESTING

Employees are subject to certain categories of drug and/or alcohol testing as described below.

Our company may test for some or all of the following substances, depending upon the occasion and type of test: amphetamines (including methamphetamine, MDMA (ecstasy), MDA, MDEA), barbiturates (sleep aids, Nembutal), benzodiazepines (Xanax, Zoloft) cocaine (crack, blow), marijuana (hash, weed, cannabis, and including synthetic marijuana, K2, "spice"), opiates and synthetic opiates (heroin, morphine, oxycodone, methadone), phencyclidine (PCP, angel dust), Methaqualone (Quaaludes), propoxyphene (Darvon), and/ or alcohol. Other substances may be added to this list.

Note: This policy will be applied in a manner that complies with federal, state, and local law. If this policy is inconsistent with the law applicable at a particular location, local managers and human resources personnel will be trained to ensure the policy is administered in a manner that is in compliance with that law.

TESTING PROCEDURES

All company-utilized testing facilities, including collection sites and drug testing laboratories, are expected to comply with state law and, to the extent not inconsistent with state law, with regulatory guidelines published by the U S. Department of Health and Human Services (DHHS) for federal workers. Our company's testing practices will ensure:

- Privacy of tested individuals
- Non-discriminatory testing methods
- Integrity of specimens

CONSENT

Our company will not permit any alcohol test to be administered, sample collected, or drug test conducted on a sample without the written consent of the person being tested. A person's refusal to submit to a proper test will be viewed as insubordination and will lead to discipline, up to and including termination. Attempts to tamper with, substitute, adulterate, dilute, evade or otherwise falsify a test sample are considered refusals to submit to a test, as is a failure to appear at the testing location promptly. Our company will pay the costs of all drug and/or alcohol tests it requires of its employees.

OTHER ALCOHOL-RELATED CONDUCT.

- a. No driver tested under the provisions of subpart C of this part who is found to have an alcohol concentration of 0.02 or greater but less than 0.04 shall perform or continue to perform safety-sensitive functions for an employer, including driving a commercial motor vehicle, nor shall an employer permit the driver to perform or continue to perform safety-sensitive functions, until the start of the driver's next regularly scheduled duty period, but not less than 24 hours following administration of the test.
- a. Except as provided in paragraph (a) of this section, no employer shall take any action under this part against a driver based solely on test results showing an alcohol concentration less than 0.04. This does not prohibit an employer with authority independent of this part from taking any action otherwise consistent with the law.

RIGHT TO RE-TEST

An individual whose test is verified positive for the presence of illegal drugs may request that his/her original test sample be sent to an independent certified laboratory for a second confirmatory test, at the individual's expense.

Requests for re-tests must be made promptly, generally within seven days of being notified of the positive test result. Tests that fail to reconfirm will be disregarded and the individual will be reimbursed for the cost of the test.

A request for re-test will not prevent the company from suspending, transferring, or taking other appropriate action with respect to the employee's work assignment, pending the results of the re-test.

TESTING CATEGORIES

The following testing categories constitute our company's drug and alcohol testing program:

- **Pre-employment** – all candidates for employment must successfully complete a post-offer pre-employment drug screening with a verified negative (non-dilute) test result.
- **Universal Testing** – except where such testing is prohibited by state or local laws, all employees not subject to random testing under DOT regulations will be subject to drug testing under our company's Universal Testing category.



Important: Employees will not be tested for alcohol under this category.

Employees will be selected at random by a computer program and/or a third-party service. All employees in the random testing pool have an equal chance of being selected for testing each time a selection is made. Tests will be conducted throughout the year and spread in such a manner as to make the test dates unpredictable.

The location manager or designated location contact will receive a confidential list of employees selected for testing. Selected employees must report to the collection site for testing as soon as possible on the day that they are notified.

Employees who refuse to submit to testing will be immediately terminated. Similarly, employees who fail to report to the collection site within an appropriate amount of time will be immediately terminated, unless we conclude the delay was caused by circumstances beyond the employee's control, which will be determined by location management and human resources.

REASONABLE SUSPICION

All ECF employees at all locations are subject to Reasonable Suspicion testing for drugs and/or alcohol when it appears the employee may be under the influence of drugs or alcohol and/or is otherwise in violation of this policy. Only supervisors who have been specifically trained to recognize the signs of drug abuse or alcohol misuse, based on the physical appearance, body odors, performance or behavior may determine when Reasonable Suspicion testing is warranted.

Note: Approval from a human resources representative is required before an employee may be tested under the Reasonable Suspicion category.

POST-ACCIDENT

Employees whose acts, or failure to act, appear to have caused or contributed to a serious accident or incident may be asked to submit to post-accident testing.

IF IT DOESN'T F.I.T. – DON'T TEST

F	Fatality	→	TEST
I	Injury Immediately treated away from the scene	→ Driver Cited Moving violation	→ TEST
T	Towed One or more vehicles due to disabling damage	→ Driver Cited Moving violation	→ TEST

No driver required to take a post-accident alcohol test under this policy may use alcohol for eight hours following the accident, or until he/she undergoes a post-accident alcohol test, whichever occurs first. (Violation 382.209.)

ACTION ON POSITIVE RESULT

In the event a confirmatory evidential breath test yields a result indicating an alcohol concentration level of .02 or greater, the individual tested will be immediately removed from the performance of any safety-sensitive function and prohibited from operating a personal or other motor vehicle. That individual will also be responsible for arranging appropriate transportation home or back to the workplace (if the Company did not transport him to the testing site). If the individual refuses to comply and continues to attempt to operate a motor vehicle, the Company, collection personnel and/or BAT will take appropriate measures to discourage the individual from doing so, including contacting local law enforcement officials. Any individual who fails to cooperate with any of the above procedures will also be subject to discipline, up to and including discharge.

Employees must:

- Remain readily available for drug and alcohol testing until they have been tested or 32 hours have passed since the accident.
- Notify management where they can be contacted.
- Refrain from drug and alcohol use until they test.
- Make themselves available for testing when they leave the scene of an accident/injury.

Employees who do not remain readily available will be considered to have refused the D & A Test.

- Alcohol testing should be administered within two (2) hours of the collision.
- Alcohol testing cannot be administered if more than eight (8) hours have elapsed since the collision.
- Drug testing must be conducted as soon as possible, but not later than 32 hours after the collision.
- If testing cannot be administered within the required time limits, a Post Accident Documentation Form must be completed.
- A moving violation must have been given (fatality excluded) to the driver in regards to the accident.

RETURN-TO-WORK

Our company requires drug testing for non-DOT regulated employees who are returning from a leave of absence of 90 days or longer. Return-to-Work testing applies, regardless of the type of leave taken, including military, medical, maternity, and personal.

UNANNOUNCED FOLLOW-UP TESTING

Our company's Drug and Alcohol Policy requires an employee who has successfully completed a drug/alcohol rehabilitation program to be subject to unannounced drug/alcohol tests for two years following the completion of the program (up to five years for DOT-regulated employees, if prescribed by the employee's substance abuse professional).

REFUSAL TO SUBMIT TO TESTING

An employee who refuses to submit to required drug or alcohol testing will be considered to have failed the required test. Attempts to substitute, dilute, adulterate, or otherwise tamper with any test sample or to avoid the testing process are treated as a refusal to test, as is submission of more than one dilute specimen on a particular testing occasion. Refusals will result in immediate termination or the withdrawal of an offer of hire.

CONFIDENTIALITY

Management will attempt to maintain confidentiality and respect employee privacy at each phase in the drug and alcohol testing process. Test results will be shared within the company and its agents only on a need to know basis and test results will not be released outside the company except with the written consent of the individual or as required by law or legal process.

DRUG-FREE WORKPLACE COMPLIANCE

ECF has implemented a drug testing program in compliance with local, state and federal laws. Employees are prohibited from reporting to work or working while using illegal or unauthorized substances.

Employees are prohibited from reporting to work or working when the employee uses any controlled substance, except when the use is pursuant to a doctor's orders and the doctor advised the employee that the substance does not adversely affect the employee's ability to safely perform his or her job duties.

In addition, employees are prohibited from engaging in the unlawful or unauthorized manufacture, distribution, sale or possession of illegal or unauthorized substances in the workplace including: on organization paid time, on organization premises, in organization vehicles, or while engaged in organization activities.

Your employment or continued employment with the organization is conditioned upon your full compliance with the foregoing substance abuse policy. Any violation of this policy may result in disciplinary action, up to and including discharge.



DRIVER VIOLATIONS JEOPARDIZING EMPLOYMENT

Drivers begin their employment based on their prior three-year driving record. Maintaining a safe driving record is the foundation for continued employment.

Drivers could be considered for termination if any of the following violations occur:

- Excessive speeding, which is driving 15 miles per hour or more above the posted speed limit
- Possession of alcohol in a vehicle is violation of local or state laws or the Federal Motor Carrier Safety Regulations (FMCSR)
- Driving while under the influence
- Violating a traffic control law in connection with a fatal accident
- Driving while physically impaired
- Driving with an expired license
- Violating out-of-service orders
- Reckless or careless driving as defined by state or local law or regulation, including but not limited to, offenses of driving a motor vehicle in willful or wanton disregard for the safety of persons or property
- Improper or erratic traffic lane changes
- Following a vehicle too closely

Also included are the following violations arising in connection with a collision:

- Violation of state or local law relating to motor vehicle traffic control (other than parking, vehicle weight, or vehicle defect violations).
- Leaving the scene of an accident.
- Other acts directly contributing to the cause of a collision.

MAJOR PREVENTABLE COLLISIONS

Drivers may be considered for termination if they have any major preventable collisions. A preventable collision is a traffic incident where the driver did not do everything possible to avoid the mishap, which resulted in:

- Fatality
- Serious medical treatment, away from the scene of the collision, for one or more individuals involved in the collision
- More than \$20,000 in total property damage
- One or more vehicles being towed due to disabling damage (damage preventing the vehicle from leaving the scene of the collision under its own power)

SUSPENSION, REVOCATION, OR CANCELLATION OF DRIVER'S LICENSE

Drivers may be terminated immediately if the annual review of their Motor Vehicle Registration (MVR) indicates that their driver's license is currently suspended, revoked, or cancelled, including for administrative reasons (non-safety related) or if their MVR shows convictions resulting from drug charges or a felony while driving a personal or commercial motor vehicle.

DRUG AND ALCOHOL USE, ABUSE AND TESTING

Any driver who receives a citation or other motor vehicle action for driving under the influence (DUI), or driving while intoxicated (DWI) while on company business, must report the motor vehicle action to their supervisor within 24 hours of the action or citation.

Department of Transportation (DOT) regulated employees who receive a DUI/DWI citation or other motor vehicle action outside the scope of employment or outside of their working hours are required to report this to their supervisor within 24 hours of the action or citation.

ECF has the right to suspend driving privileges or terminate any employee whose position requires driving a motor vehicle, if that employee receives a DUI or DWI motor vehicle action.



DRIVER ATTIRE

CLOTHING

- Proper dress is required while on duty. Wear uniforms as directed by your location supervisor.
- The shirttail must be tucked inside trousers.
- Wear appropriate protective gloves, eye protection, reflective vests or other clothing or equipment (personal protection equipment) when performing hazardous tasks and/or as directed by your immediate supervisor.
- If vehicle fuel, cleaning solvents, or chemicals are spilled on your clothing, wipe it off as soon as possible, and if excessive, change clothing.

PERSONAL PROTECTIVE EQUIPMENT

- Proper protective equipment must be worn (gloves, glasses, goggles, face shield, apron) when working with various hazards. Review your location's specific personal protective equipment requirements with your supervisor.
- When working outdoors during cold weather, gloves, jackets, and additional protective footwear must be worn to guard against frostbite and wetness, as well as to reduce the chance of slipping.



HOUSEKEEPING REQUIREMENTS

TIRE AND WHEEL SAFETY

Drivers should:

- Check tire pressure daily. Failure to do so can result in extreme vehicular fees. Correct tire pressures are posted on the exterior of your vehicle.
- Only operate a vehicle with properly inflated tires. Tires should be checked daily for proper required tread depth and to ensure no sidewall damage exists (bulges, gouges, cuts, and tread separation).
- Check wheel lugs daily for tightness.
- Ensure there are no signs of oil/wheel seal problems.
- Never climb on tires or wheels. Greasy surfaces may only serve to contribute to slips, trips or falls.
- Be aware that tires are to be inflated only in a tire cage. If any tire is identified on the service island as 10+ PSI lower than specified, it must be removed, repaired, and inflated in the tire cage.

KEY CONTROL / VEHICLE AND CARGO SECURITY

- All unattended vehicles must be properly parked with the engine turned off, brakes set, and keys removed, including customer vehicles, vendor vehicles, private vehicles, and company-owned and operated vehicles.
- Leaving a vehicle running without a driver at the controls of the vehicle for any reason is prohibited.
- Do not leave vehicle keys inside parked equipment under any circumstances.
- Ensure that parked equipment is locked when unattended.
- Place only one set of keys on the keyboard or in the lock box.
- Ensure that vehicle keys either remain in the possession of the driver (if remaining on premises) or are secured in a designated location inside the facility.
- Ensure that vehicle cargo doors are secured (if applicable), seals are in place, and that uncoupled trailers are secured with kingpin or other suitable locking mechanisms.
- Do not park vehicles at locations that encourage unauthorized entry, vandalism or damage.



PROCESS FOR VEHICLE REPAIRS

ROADSIDE ASSISTANCE

Roadside assistance records are required to be kept for 12

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ECF Fleet Important Phone Numbers

Service	Service Provider Name	Phone Number
Roadside Assistance	Enterprise National Service Department	1-800-325-8838
WEX Enterprise ExxonMobil Card Support	Customer Service Representative	1-888-774-4939
Administrative Support	ECF - Stephanie Sherels	561-471-4029 Ext. 233
Administrative Support	ECF – Shauna Hawkins	561-876-6096

*For all maintenance issues, take the vehicle to any local dealership of the make of the vehicle or Firestone. Simply provide VIN number, or request servicer to scan vehicle VIN number for vehicle information. **Please indicate the vehicle is associated with Enterprise Fleet under EC Fennell PA account.**

VEHICLE SAFETY PROCEDURES

SEAT BELTS

Drivers/passengers must properly wear seat belts and shoulder belts when a vehicle is in motion. This policy also includes usage of bunk restraints when in the sleeper. Riding on any vehicle, except in the seat, is prohibited.



Important: Failure to follow this policy will result in disciplinary action, up to and including termination.

UNAUTHORIZED PASSENGERS

Unauthorized passengers, employees, relatives, customers, or pets are prohibited in vehicles. Any passengers riding in vehicles are required to have written approval on file with the company prior to the trip.

CELL PHONES AND TEXTING

Company drivers must follow applicable laws relating to the use of mobile phones. In addition to federal, state and/or local laws regarding the usage of mobile phones, we require all employees to abide by the following rules when using mobile phones for company business or while driving company-owned, leased, or rented vehicles:

- Do not use mobile phones in potentially hazardous conditions that could jeopardize employee or public safety. Hazardous conditions, include driving in heavy or congested traffic, construction zones, on slippery roads, during poor visibility, near railroad crossings, in parking lots, while backing or transporting hazardous material, in residential areas, school zones, or areas where children play.
- The only exception to using a mobile phone in potentially hazardous conditions is during times of an emergency, such as reporting collisions to emergency personnel, calling law enforcement for assistance, reporting road hazards to the authorities, or notifying authorities of erratic drivers.
- All mobile phones used for company business must be equipped with voicemail to allow employees to return incoming calls during non-driving periods.
- Eliminate or minimize mobile phone communication during drive times.
- Use a hands-free phone or device when the vehicle is moving.
- Keep calls as short as possible and ensure calls are made only for business or emergency purposes.



Important: Non-compliance with this policy may result in corrective action, up to and including termination.



SECURITY RULES

GENERAL

We have a zero-tolerance policy regarding any instances of work place harassment, intimidation, threats, violence, or theft. Any employee violation may result in disciplinary action, up to and including termination.

If you become aware of or witness any illegal or unethical conduct, or acts of theft or dishonesty, you must report this to your supervisor immediately. Additionally, inventory practices, controls, routings or security practices are proprietary to and should not be discussed with individuals outside of the company.

SECURITY WHILE DRIVING

- Be aware of your surroundings and anything that does not look right.
- At stops/deliveries, always remove the ignition keys, lock the vehicle, and keep keys in your personal control for the duration of the stop.
- Be aware of vehicles that seem to be following your vehicle, especially when departing from distribution centers.
- Be aware of any unknown person(s) who seem to be watching or filming vehicles/warehouse operations.
- If unattended, turn off the engine, remove the keys, and fully lock and secure the vehicle.
- If on a driver team, leave your vehicle one at a time to ensure it is supervised. Do not drive your vehicle home, to any other personal residence, or leave it unattended in unsecured parking areas.
- Do not pick up hitchhikers or allow unauthorized passengers in the vehicle.



SUMMARY

This manual is intended to provide drivers with a basic understanding of the hazards present in the workplace. It identifies many common safety misconceptions and violations.

Two things can cause an accident – an unsafe act and an unsafe condition. The employee controls them both.

It is a driver's responsibility to develop and implement safe work habits and to complement these work habits with the common sense safety practices. Any driver who ignores or abuses safety rules and procedures will be disciplined accordingly, and continuous violations could result in termination.

Driver supervisors are available to discuss or clarify any items in this manual. For further information on a specific standard or interpretation of a regulatory requirement, contact your Safety, Health, and Security Manager.

ECF strives to create a safe work environment where our employees can perform productively and effectively. Your commitment to working safely and securely will help us create a work environment that is collision and injury-free.

ACKNOWLEDGEMENT RECEIPT

I, _____ acknowledge receipt of the Driver Safety Manual.
[PRINT NAME CLEARLY]

Furthermore, I agree to familiarize myself with these work rules and work within their guidelines.

I understand that these safety, health, security, and environmental rules are not all-inclusive but serve to complement the established work rules of my work place.

Employee signature: _____

Witness Name: _____

Witness Signature: _____

Date: _____



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