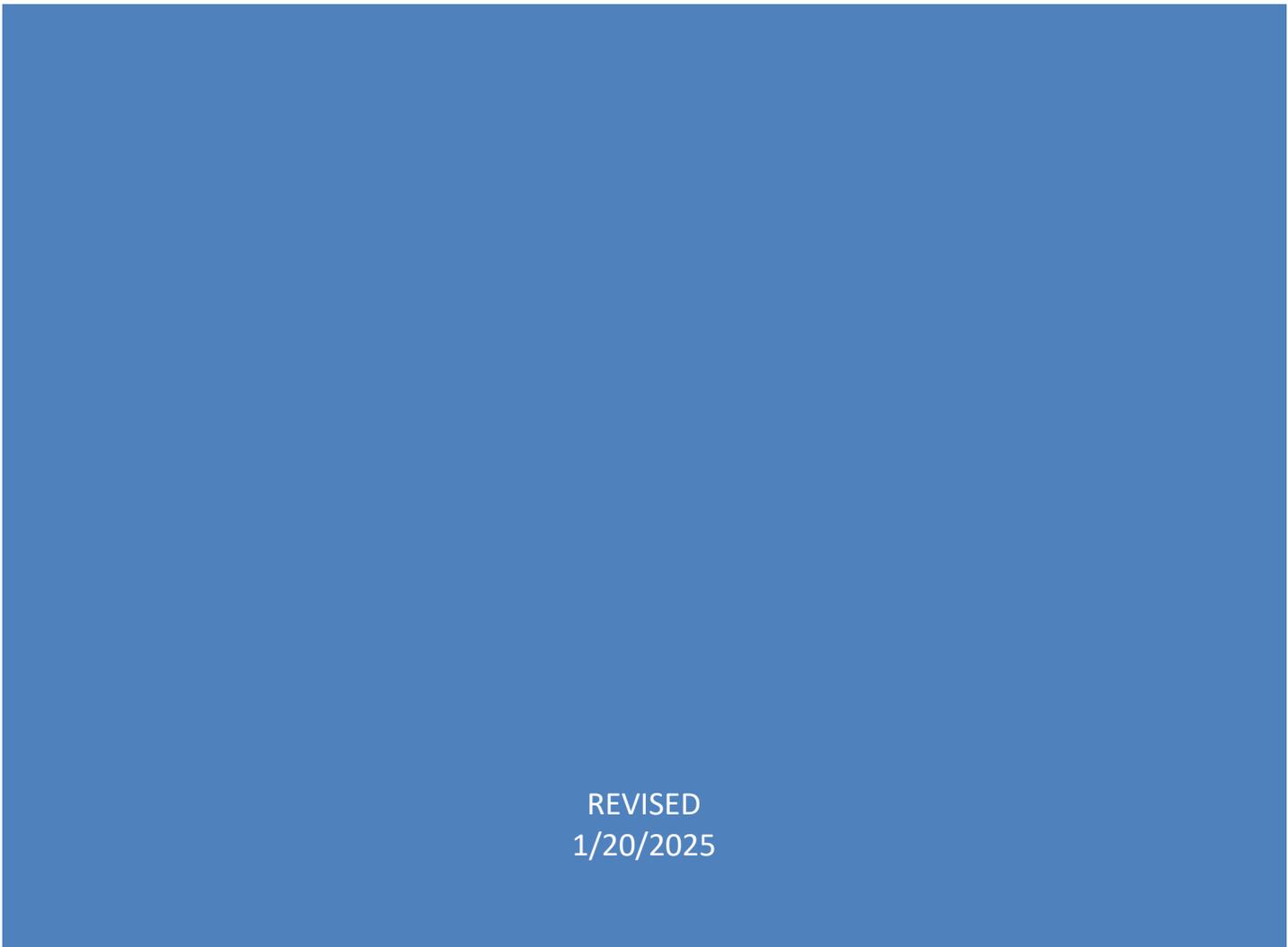




PERFICUT FLEET SAFETY PROGRAM



REVISED
1/20/2025

Perficut Motor Vehicle Operation Program

Purpose

This written Motor Vehicle Operation Program establishes guidelines to ensure that we hire capable operators, only allow eligible operators to drive a "covered motor vehicle," train and supervise operators, and maintain vehicles properly. A "covered motor vehicle" is a motor vehicle that is owned, leased, or rented by the company or is a driver-owned vehicle operated during worktime.

Adherence to this written program can improve traffic safety performance, minimize the risk of motor vehicle incidents, and help to keep our employees safe and our costs as low as possible. Copies of the written program may be obtained from the Human Resource Generalist.

Policy

Company management believes that the safety and well-being of all company employees is an economic and humanitarian priority. The use of automobiles for company business is included in the commitment to a safe working environment. This fleet safe driver program is supported by top level management with a company requirement that all employees driving on company business participate in the program and drive safely. It covers all assigned drivers of company owned or leased vehicles and includes employees who operate their own cars for company business. All levels of management and employees are expected to fully support and cooperate with program requirements to prevent accidents and resulting injuries and property losses. Our goal is zero preventable vehicle accidents. Components of this program include:

- Management and employee responsibility
- Vehicle assignment, selection, maintenance, and usage
- Insurance requirements
- Employee driver's license checks, MVR review, and identification of high-risk drivers
- Accident reporting instructions, kits, and investigation
- Training and recordkeeping
- Federal, state, and local regulatory compliance

There is no excuse for driving unsafely. There is no delivery, repair, installation or sales call that is more important than the life and health of our employees.

Management is responsible for the successful implementation and maintenance of this program. All employees are responsible for program compliance and reporting. Program compliance and results will be considered in management, supervisor, and employee performance evaluations.

This policy is communicated to employees and others working for our company who are authorized to operate motor vehicles, through safety talks, meetings and training sessions.

Management Leadership

Our Human Resource Generalist is our Motor Vehicle Operation Program Administrator. The Program Administrator coordinates the Motor Vehicle Operation Program elements for our company. This person is responsible for setting up and managing the program so that managers, supervisors, and employees know what our company

expects. This person is accountable for meeting these responsibilities because we will review the effectiveness of the program results, yearly, during their performance appraisal. Our Human Resource Generalist has the authority to carry out duties in a timely manner so that progress is made in meeting program goals. Our Human Resource Generalist is also provided with the following resources and information sufficient to meet those responsibilities: A Safety Committee, contracted Safety Consultant and Keller Online Safety Management Tool.

Our Director of Process Improvement has examined our existing policies and practices to ensure that they encourage and do not discourage reporting and participation in our program. In this way, early reporting of motor vehicle incidents and hazards and meaningful employee participation in the program are more likely to occur. All company incentive programs are designed to reward safe motor vehicle operation (such as active participation in the program, the identification of motor vehicle hazards in the workplace, and the reporting of motor vehicle incidents early), rather than to reward employees for having fewer or lower rates of motor vehicle incidents.

Employee Involvement

Our employees and their representatives are expected to understand our motor vehicle incident reporting system, so that reports of incidents and hazards are received in a timely and systematized manner. Perficut's Human Resource Generalist responds promptly to all reports.

The Production Manager provides employees and their representatives with basic information about motor vehicle operation, driving hazards, responsibility assignments, Motor vehicle incident/hazard records, etc. This information can also be obtained from our Human Resource Generalist. However, no confidential or private information of a personal nature, such as medical records, will be provided.

Our program incorporates the following ways for employees, or their designated representatives, if applicable, to be involved in developing, implementing, and evaluating each of the program elements: Becoming a member of the Safety Committee, discussion during the safety section of your performance review or simply discussing with your manager, Human Resource Generalist or Director of Process Improvement.

Company Rules

Perficut Companies, Inc has motor vehicle operation rules that are specific to our company.

Alcohol and Drug Use Policy:

Perficut has a vital interest in maintaining safe, healthy, and efficient working

conditions for its employees. Therefore, the consumption of alcohol or illegal drugs by any employee during duty hours is prohibited. Duty hours consist of all working hours, including break periods and on-call periods, whether on or off company premises. The consumption of alcohol or illegal drugs while performing company business or while in a company facility is prohibited. Violators will be subject to disciplinary action, up to and including termination.

Seat Belt Use Policy:

Perficut recognizes that seat belts are extremely effective in preventing injuries and loss of life. It is a simple fact that wearing your seat belt can reduce your risk of dying in a traffic crash by 45 percent in a car and by as much as 60 percent in a truck or SUV. We care about our employees and want to make sure that no one is injured or killed in a tragedy that could have been prevented by the use of seat belts. Therefore, all employees of Perficut must wear seat belts when operating a company-owned vehicle, or any vehicle on company premises or on company business; and all occupants are to wear seat belts or, where appropriate, child restraints when riding in a company-owned vehicle, or in a personal vehicle being used for company business. Violators will be subject to disciplinary action, up to and including termination.

Distracted Driving Policy:

To increase employee safety and eliminate unnecessary risks behind the wheel, Perficut has enacted a Distracted Driving Policy. We are committed to ending the epidemic of distracted driving, and have created the following rules, which apply to any employee operating a company vehicle or using a company-issued cell phone while operating a personal vehicle:

ONLY hands-free devices are allowed while operating a vehicle.

Employees may not use a hand-held cell phone while operating a vehicle - whether the vehicle is in motion or stopped at a traffic light. This includes, but is not limited to, answering, or making phone calls, engaging in phone conversations, and reading or responding to emails, instant messages, and text messages.

If a company employee has a need to use a phone, tablet, or other electronic device while driving other than a hand free device they must pull over when convenient to wait until they reach their destination.

Failure to comply with these guidelines may result in revocation of driving privileges or termination.

Company Vehicle Use Agreement

Employees operating company owned vehicles agree to comply with the following vehicle use guidelines. Failure to comply with these guidelines may result in revocation of company vehicle driving privileges or termination.

Employees Responsibilities:

- Maintain a current driver's license for the company vehicles and alert Human Resources immediately if license becomes expired, restricted, or revoked.

- Notify the company of any citations received while driving a company vehicle.
- Maintain MVR within established company acceptability guidelines and allow company to access MVR records.
- Drive in a safe and courteous manner, conforming to all traffic laws, signals, and markings, and make proper allowance for adverse weather and traffic conditions.
- Be mentally and physically capable of safe and responsible driving.
- Wear a seatbelt and ensure passengers wear seatbelts.
- Adhere to proper maintenance schedules and procedures.
- Use the vehicle for business purposes only as outlined by company policy and without exposing the company to additional liability risk.
- Be financially responsible for any parking tickets or traffic citations violations
- Report all accidents within 24 hours of occurrence to Human Resources and complete an Incident Report.
- Make no modifications to the vehicle under any circumstance.
- Do not loan vehicle use or allow non-company authorized drivers to operate the vehicle.
- No hitchhikers.
- No towing of trailers or mobile homes.
- Park the vehicle in a secure and legally allowable location.
- No use of alcohol and controlled substances prior to and during vehicle operation.
- No transportation of hazardous materials unless used specifically in the scope of work .
- Be courteous and always give other drivers the right of way even if they do not have it.

Violation of these responsibilities or of this jurisdiction's transportation safety requirements will be subject to disciplinary action, up to and including termination.

Operator Issues

Having good operators can go a long way toward preventing incidents and related costs.

Recruitment

To ensure that operators have the proper licensing, education, and ability to operate our motor vehicles, Human Resources ensures that the job description specifies these required qualifications.

Selection

Our job application requests information about licensing and education to help our recruiter select a candidate qualified to operate a motor vehicle. Completed job applications of those we hire are kept in our personnel files.

In order to screen out operators who have poor driving records, Human Resources checks the motor vehicle records of all applicants and employees who will drive for work

purposes or drive a company- owned, -leased, or -rented vehicle for personal use. The results of these checks are also kept in the person's personnel file.

The following qualifications must be met when selecting an applicant or current employee to operate a motor vehicle:

- Is of legal driving age,
- Consents to a motor vehicle records check, in accordance with the Fair Credit Reporting Act:
- Has a license that is valid, has not expired, is the appropriate class for company vehicles, has the appropriate endorsements, is issued by the applicants' current state of residence.
- Consents to a drug and alcohol test and passes the drug and alcohol test; Passes a pre-employment physical examination, if required by law.

An Ineligible Driver would be the following, the rest would be considered Eligible.

Ineligible:

- 3 or more chargeable violations in last 3 years
- Any major violation (DUI, reckless driving, leaving the scene, passing a stopped school bus, etc.) in the last 5 years.

Perficut Companies, Inc will follow all Americans with Disabilities Act requirements for considering and accommodating those with disabilities.

Agreements

Our company establishes a contract with all employees who drive for work purposes, whether they operate assigned company vehicles or operate their personal vehicles. By signing our agreement, the operator acknowledges awareness and understanding of the company's traffic safety policies, procedures, and expectations regarding operator performance, vehicle maintenance, and reporting of moving violations.

1. Drivers must maintain an acceptable motor vehicle record (MVR). This record will be judged based on written criteria established in this program.
2. Assigned drivers involved in a third (3rd) preventable accident may have their company driving privileges revoked.
3. Drivers should immediately notify Human Resources of all major and minor motor vehicle accidents and violations. This notification should be within 24 hours of occurrence.
4. Driving under the influence of alcohol or restricted drugs is prohibited and will subject the employee to disciplinary action, up to and including termination. Drivers must also be aware of the effects that prescription and over-the-counter medications have on their level of alertness and must take appropriate action.
5. Drivers must drive defensively and obey all traffic laws. Turn signals must be properly used. Know the right-of-way rules and always assume that the other drivers do not know them or will ignore them.

6. Speed shall never be faster than posted speed limits and should be reduced as road, traffic, and weather conditions dictate.
7. Always maintain a safe following distance to avoid rear-end collisions. This should be at least 3-seconds when driving private passenger cars and at least 4-seconds when driving vans and light trucks. Increase your following distance for fog, wet weather, snow / icy road surfaces, or other hazardous driving conditions. Always slowdown in school zones and congested areas.
8. If your vehicle is covered with snow or ice, clean off all windows, lights, turn signals and your roof. Remember that if you do not clean off the hood, the snow will melt and fly onto your windshield.
9. Plan your trip each day. Plan your route before you start out to avoid making sudden turns. If you do get lost and fall behind schedule, resist the temptation to make up time on the road.
10. Keep to the right except when overtaking slow-moving vehicles, or when getting into a position to make a left turn. Never pass another vehicle on the right.
11. Seat belts shall be worn at all times by drivers and passengers.
12. Check your vehicle daily before each trip and check the vehicle visually each time before driving. Check lights, tires, brakes, and steering. An unsafe vehicle should not be operated until repairs are made.
13. Cell phone use, except hands free equipped, may not be used while the vehicle is in motion.
14. Unauthorized passengers are not allowed in vehicles.
15. Share the road with other vehicles and drive with courtesy.
16. Vehicles should not be driven when the driver is fatigued or ill.
17. Vehicles will be properly loaded with the use of tie downs as needed.
18. Unless granted permission, only eligible company drivers are allowed to operate the vehicles.
19. Vehicles must be kept clean and orderly at all times.

Training

Under no circumstances may an employee operate a covered motor vehicle until he/she has successfully completed this company's motor vehicle operation training program. Our Human Resource Generalist will identify trainees in each set of new employees and make arrangements with department management to schedule training. Our Human Resource Generalist will also identify those existing employees who need retraining.

Training is done internally. A Production Manager is responsible for conducting training and retraining. His/Her/Their qualifications include training on the fleet safety program.

The company training program includes classroom instruction, i.e., lecture, discussion, videotape, and/or conference formats, and/or enter practical, on-the-road instruction.

Through training we ensure that motor vehicle operators are knowledgeable in:

- A review of company program Mission Statement and Statement of Safety Policy
- Company safety rules
- Defensive driving techniques
- Reviews the hazards and signs of fatigued driving
- Conducting vehicle inspections using program checklists
- Emergency procedures and post-accident procedures
- Review of vehicle type and their unique operating characteristics
- Federal Motor Carrier Safety Regulations as they apply
- Cargo handling and load securement, as applicable
- Ensures employees have the correct and valid endorsements for the vehicles they will be operating.

After an employee has completed the training program, the instructor will determine whether the employee can safely operate a motor vehicle. If the employee passes, Human Resource Generalist places a training record in the employee's personnel file. This record includes employee name, employee #, date trained, topics trained and employee signature.

Vehicle Issues

Selecting, properly maintaining, and routinely inspecting company vehicles is an important part of preventing motor vehicle incidents and related losses.

Selection

Ownership and Head of Operations are responsible for selecting, leasing, and renting vehicles for company employees. This person reviews and considers the safety features of all vehicles to be considered for use.

Those vehicles that demonstrate "best in class" status for crashworthiness and overall safety should be chosen and made available to operators. However, other factors to be considered include adequate for use, sufficient cargo space, ability to be towed, and safety and ergonomic features.

Before use, the Shop Manager ensures that all vehicles are supplied with the following equipment: maps to nearest medical facilities, safety kits and fire extinguishers.

Modification

Should a vehicle need to be modified, the Shop Manager will ensure that the modification does not in itself create a hazard.

Maintenance

The Shop Manager ensures that vehicles meet or exceed the manufacturer's specified routine preventive maintenance schedule for servicing and checking of safety-related equipment. Where no manufacturer recommendation is made or where legal or best practices provide more stringent maintenance frequencies, we follow the appropriate legal requirement or best practice. Additionally, The Shop Manager ensures that vehicles

are serviced immediately after we are notified of a recall.

Scheduled maintenance and repairs are performed by the internal Shop staff. The Shop Manager has determined that the internal Shop staff is qualified for performing such maintenance and repair.

The Shop Manager is also responsible for regularly replacing vehicles according to the following procedure: as deemed unsafe by Shop, Head of Operations or Ownership.

Personal vehicles used for company business are not necessarily subject to the same criteria and are generally the responsibility of the owner. However, personal vehicles used for company business should be maintained in a manner that provides the employee with maximum safety and reflects positively on the company.

Inspection

The Shop Manager ensures that Shop staff performs a thorough inspection of each vehicle at least annually and/or according to manufacturer recommendations, legal requirements, and/or best practices. Shop staff places the results in the vehicle's file. However, vehicle operators must also perform a visual inspection of any vehicle before operating it. This inspection must cover the following parts, equipment, and accessories are in safe operating condition and free of apparent damage that could cause failure while in use: service brakes, including trailer brake connections; parking system (hand brake); emergency stopping system (brakes); tires; horn; steering mechanism; coupling devices; seat belts; operating controls; and safety devices. All defects shall be corrected before the vehicle is placed in service. These requirements also apply to equipment such as lights, reflectors, windshield wipers, defrosters, fire extinguishers, etc., where such equipment is necessary.

These reports will be filed and reviewed by each department manager until the end of the calendar year when they will be filed in the DOT file (shop admin) and stored for a period of 3 years.

If a vehicle defect is found, note this on your Inspection Form and immediately submit an Equipment Repair Request using your Perficut app.

Security

We are committed to ensuring the physical safety of our motor vehicle operators and to reduce or prevent vehicle and cargo theft and damage.

Incident Reporting and Investigation

A motor vehicle incident is a negative occurrence that involves a "covered" motor vehicle and that caused or could have caused injury, illness, or property damage. Motor vehicle incidents include but are not limited to:

- Single-/Multiple-vehicle crashes resulting in injury, illness, or property damage.
- Vehicle fires.
- Loose vehicle cargo.
- Objects impacting the vehicle;
- Disaster-related damage/injury;

Near misses.

- Impaired, aggressive, fatigued, or distracted driving.
- Failure to wear a seat belt.
- Any traffic violation for which law enforcement provides a warning or ticket.
- Carbon monoxide-related illnesses caused by motor vehicles.
- Suspicious activity or security threats related to a covered motor vehicle(s).
- On-the-road vehicle breakdown.

Motor vehicle incident reporting procedures are kept in each vehicle. Here are our incident reporting procedures: Complete the Incident Report found on the Perficut app within 24 hours of occurrence. In addition, follow up with a phone call to your direct manager and/or Human Resources.

The above incident reporting procedures will be enforced. Failure to meet incident reporting procedures will lead to the following disciplinary action: employee write-up or in some cases termination.

All motor vehicle incidents will be investigated to determine their causes and whether or not the incidents were preventable. Understanding the root causes of incidents and why they are happening, regardless of fault, forms the basis for eliminating them in the future. Here are our motor vehicle incident investigation procedures: The investigator should identify factors, including driver-, vehicle-, road-, weather-, or company-related factors that may have affected the severity of the incident. The investigator will review the findings to determine whether the incident was preventable. The investigator will then complete a causal report and allow the vehicle operator to review it for accuracy. The investigator will then submit the report to the person or team able to take necessary corrective and preventive action.

If the incident was not correctable or preventable, the following steps are taken: The information is shared at the next Safety Committee Meeting and filed.

However, if the incident was correctable or preventable, the following steps are taken to correct or prevent further incidents: The information is shared at the next Safety Committee Meeting and speaking points are created to pass on to foremen for the next safety talk.

Program Evaluation

It is inherent that problems may occasionally arise in this Motor Vehicle Operation Program. By having our Motor Vehicle Operation Program Evaluator(s), Perficut Safety Committee, thoroughly evaluate and, as necessary, promptly take action to correct any deficiencies in our program, we can eliminate problems effectively. Note: The occurrence of a motor vehicle incident does not in itself mean that the program is ineffective.

At Perficut Companies, Inc, our program evaluation, performed annually by our Program Evaluator(s), involves the following: including, but not limited to, interviewing vehicle operators, inspectors, and maintenance personnel; monitoring compliance with legal requirements and the Motor Vehicle Operation Program; reviewing vehicle use rates, motor vehicle types, vehicle mileage, numbers of passengers, and incident severity;

reviewing data from event recorders; reviewing incident data, rates, and historical trends; and comparing the company rates to others in the industry.

Appendices

We have attached the following documents to this written Motor Vehicle Operation Program:

Fatigue Management:

Fatigue can be caused by many factors, including lack of sleep, driving at night, and working or being awake for long periods of time. Medical conditions and medications can also contribute to fatigue.

Here are some tips to help prevent fatigue while driving:

- Get enough sleep: Try to get at least seven hours of sleep each night before driving.
- Take breaks: Take breaks every two hours or 100 miles. When you take a break, get out of the car and walk, jog, or stretch. You can also try pulling over, drinking coffee, and taking a 15–30 minute nap.
- Avoid driving at night: Try not to start your trip very late in the day. You can also try traveling at times when you're normally awake.
- Stay hydrated: Drink plenty of water and avoid heavy meals.
- Keep moving: Keep your eyes moving about every two seconds and try using the commentary driving technique, which involves speaking aloud while you're driving.
- Recognize the signs of fatigue: Fatigue can be difficult to notice, but some common symptoms include feeling sleepy, yawning, and having slower reaction times. If you notice signs of fatigue, you can stop driving for a short nap.
- Report instances of fatigue in yourself and others to your direct supervisor, who can help to determine the safest course of action.
- Speak honestly if you are questioned about a fatigue-related incident. Fatigue is a normal biological response – it is not a reflection of how well you do your job.

Fatigued driving can be dangerous, as it can slow your reaction time and make you three times more likely to be in an accident. Drowsiness can also be as intoxicating as alcohol, and fatigued driving crashes may be more serious.

Intersections and Turning:

It is the responsibility of all drivers to approach, enter, and cross intersections prepared to avoid accidents that might occur through the actions of other drivers. Complex traffic movement, blind intersections, or failure of the "other driver" to conform to law or traffic control devices will not automatically determine an accident to be not "preventable." Intersection accidents may be preventable even though the driver has not violated any traffic regulations. Failure to take precautionary measures prior to entering the intersection is a factor to be studied in making a decision. Drivers must use turn signals and carefully check mirrors, pedestrian areas, and adjacent traffic lanes. When a driver crosses an intersection and the obvious actions of the "other driver" indicate possible involvement, either by reason of excessive speed, crossing the lane in turning, or coming from behind a blind spot, the resultant accident should be considered preventable. U-turns resulting in collisions are usually preventable accidents.

Front-end Collision:

Regardless of the abrupt or unexpected stop of the vehicle ahead, a driver can prevent collisions by always maintaining a safe following distance. This includes being prepared for possible obstructions on the highway, either in plain view, or hidden by the crest of a hill or a curve of the roadway. Over-driving headlights at night is a common cause of this type of collision. Night speed should not be greater than that which will permit the vehicle to come to a stop within the forward distance illuminated by the vehicle's headlights.

Rear-end Collision:

Investigation often discloses that driver's risk being struck from behind by failing to maintain a margin of safety in their own following distance.

Collisions involving the rear of the vehicle, that are preceded by a roll-back, an abrupt stop at a grade crossing or when a traffic signal changes, or when the driver fails to signal a turn at an intersection, should be charged as preventable. Failure to slow down gradually should also result in the accident being considered preventable.

Passing:

Failure to pass safely indicates faulty judgment and possible failure of the driver to consider one or more of the important factors that must be observed before attempting the maneuver. Unusual actions of the driver being passed or of oncoming traffic might appear to exonerate a driver involved in a passing accident; however, the entire passing maneuver is voluntary and the driver's responsibility.

Being Passed:

Accidents from sideswipes and cut-offs, involving a driver being passed, are preventable if the driver fails to yield to the passing vehicle by slowing down or moving to the right where possible.

Lane Encroachment:

Entrapment in merging traffic is an indication of unwillingness to yield to other vehicles or to wait for a break in traffic. Drivers should drop back when other vehicles are contesting lane positioning. Drivers should take extra time to review potential blind spots.

Oncoming:

It is extremely important to check the action of a driver involved in a head-on or sideswipe accident with a vehicle approaching from the opposite direction. The exact location of vehicles prior to and at the point of impact must be carefully verified. Even though an opposing vehicle enters a driver's traffic lane, it may be possible for the driver to avoid the collision by slowing down, stopping, or moving to the right. Signaling the opposing driver, by flashing the headlights or sounding the horn, should also be considered.

Fixed Objects:

Collisions with fixed objects are preventable. They usually involve failure to check or properly judge clearances. New routes, strange delivery points, resurfaced pavements under viaducts, inclined entrances to docks, marquees projecting over a traveled section or road, and similar situations are not, in themselves, valid reasons for excusing a driver

from being involved. A driver must be constantly on the lookout for such conditions and make the necessary allowances.

Pedestrians and Bicycles:

Traffic regulations and court decisions generally favor the pedestrian hit by a moving vehicle. An unusual route of a pedestrian at mid-block or from between parked vehicles does not necessarily relieve a driver from taking precautions to prevent such accidents. Whether speed limits are posted, or the area is placarded with warning signs, speed too fast for conditions may be involved. School zones, shopping areas, residential streets, and other areas with increased pedestrian traffic must be traveled at reduced speeds equal to the particular situation. Bicycles, motor scooters, and similar equipment are generally operated by young and inexperienced operators. The driver who fails to reduce speed when this type of equipment is operated within sight distance has failed to take the necessary precautions to prevent an accident. Keeping within posted speed limits is not taking the proper precaution when unusual conditions call for voluntary reduction of speed.

Weather:

Adverse weather conditions are not a valid excuse for being involved in an accident. Rain, snow fog, sleet, or icy pavements increase driving hazards and drivers must adjust driving during these conditions. Vehicles should be equipped with the appropriate equipment for adverse weather conditions.

Parking:

Unconventional parking locations, including double parking and failure to put out warning devices, generally constitute evidence for judging an accident preventable. Roll-away accidents from a parked position normally should be classified preventable. A properly parked vehicle should be locked, with the engine off, parking brake set, manual transmission in lowest gear, multi-speed axle in low range, and wheels blocked or turned toward a curb to prevent vehicle movement (Note: A driver should not use the trailer and valve or set the emergency braking control to hold a parked vehicle).

Backing:

Practically all backing accidents are preventable. A driver is not relieved of the responsibility to back safely when a signaler is involved in the maneuver. A signaler cannot control the movement of the vehicle. Therefore, a driver must verify all clearances. When backing up a truck at a job and we have multiple team members in the truck, we require one gets out of the truck and spots the backup process.