

Manual Section 5	Issue Date 03/17/10	Revision Date 06/15/21	Policy Number LLCP-045
	Driving & Road Transportation		

Purpose

This written Policy establishes guidelines to ensure that we hire capable drivers, only allow eligible authorized and trained drivers to drive a “covered motor vehicle,” train and supervise drivers, maintain vehicles properly, investigate necessary vehicle accidents, eliminate backing accidents and develop a defensive driving culture for all vehicle drivers. A “covered motor vehicle” is a motor vehicle that is owned, leased, rented by the company, or is a driver-owned or client-owned vehicle operated during the course of performing our work. Our goal is to establish level requirements for assessing, controlling and monitoring the Company’s driving and road transport activities such that driving and road transport hazards and risks can be managed as low as reasonably practicable.

Scope

All LLC Companies including, Blanchard Industrial, LLC, GIS Engineering, LLC, Grand Isle Shipyard, Inc., and GWIS, Mack Steel, NuWave, Sun Industries; hereafter identified as “Company”.

Policy

The Company is committed to reducing traffic-related deaths, injuries and reducing costs associated with vehicle incidents. It is our expectation that employees adhere to company rules and obey the law, for the consequences of disregarding them will result in a progressive discipline up to and including termination of employment as outlined in the Corporate HSE Manual.

Driving On Company Business

This Policy focuses on managing the hazards and risks associated with driving on Company business and applies to “authorized” Company employees and contractors who drive Company-provided vehicles (owned and/or leased), rental vehicles (when expenses are reimbursed by the Company).

Responsibility

Asset Managers & Supervisors requirements

Managers and Supervisors are accountable for implementing and managing this policy and shall demonstrate leadership and commitment with the following activities actions and behaviors:

- Communicate the importance of managing driving and road transport activities along with other HSE related activities.
- Ensure that personnel under their supervision complete driver training requirements prior to vehicle operation.
- Set good example with personal driving attitude and performance.
- Provide training resources and manage fitness to drive issues.
- Recognize and reward (i.e., “job well done”) innovations and improvements (best practices)
- Ensure that personnel under their supervision who are required to drive a motor vehicle have been given the opportunity to read this program and have been given time to ask questions and receive answers in regard to this program.

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Employees

Employees are responsible for following procedures in accordance with their training and the instructions of their supervisor. Employees must

- Perform job assignments in compliance with this program and company policy.
- Ensure they obey all applicable laws covering operation and license of motor vehicle operation.
- Notify supervisor of any changes in ability to operate a motor vehicle due to off-the-job traffic citations, accidents or physical injury which may limit the employee from performing their on-duty driving requirements.
- Assess and address driving hazards (i.e., journey planning, fitness to drive, safe driving behaviors, etc.)
- Attend appropriate level of Corporate Driving class
- Comply with requirements for Company-provided vehicles, rental vehicles.
- Secure all loads within the manufacturer's legal limits.
- Report and manage driving incidents and monitor driving performance.
- Recognize and implement improvement opportunities.
- Use hands-free devices while driving if communicating is a necessity. (if applicable)
- Never text while driving.
- Always use headlights on all moving company vehicles, regardless of time of day.

HSE Department requirements

The Corporate HSE Department will provide oversight for the process through observations and auditing, coordinate incident management and performance reporting. Also:

- Facilitate training of all personnel identified under this policy.
- Evaluate the Policy annually or when changes have occurred to federal, state or Company driving requirements, and revise the policy as appropriate under the direction of the Corporate HSE Director.

Company requirements on Motor Vehicle Laws and Regulations

Company Motor Vehicle Operation Rules Listed below are motor vehicle operation rules adopted by the Company for the health and safety of all employees:

- **Maximum speed driven in a Company vehicle is 70 mph regardless of the posted speed limit!!!**
Any employee driving above 70 mph in a Company vehicle will be subject to disciplinary action up to and including discharge.
- All vehicle operators must have a current valid Driver's License, appropriate to the class of vehicle being driven. The license must be carried on their person at all times while operating a vehicle. (i.e., Chauffeur's license, commercial license, etc.)
- Avoid distractions such as playing with the radio, eating and drinking while driving.
- Seat belts are to be worn by all occupants of a Company owned or leased, or client owned or leased motor vehicle while that vehicle is in motion regardless whether the vehicle is operated on public or private roadways.

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- For those commercial vehicles designed and approved by the DOT without passenger seatbelts as required safety equipment (e.g. buses), the driver will wear the provided seatbelt and passengers shall remain seated at all times the vehicle is in motions.
- Seat belts are to be worn by all employees while using their personal vehicle for company business. If a personal vehicle is designed without seatbelts, then employee must make other transportation arrangements to stay compliant with Corporate motor vehicle operation rules.
- Seat belts are to be worn by all employees driving a rental car while on company business.
- Where required by client(s), safety glasses or other safety equipment are to be worn by driver and passengers in all vehicles.
- Employees are not to operate a motor vehicle if they are fatigued or exhibit the effects of tiredness.
- Employees are not to operate a motor vehicle if they are under the influence of illegal drugs, alcohol or certain prescription medications labeled with a Caution when Operating Machinery or Motor Vehicle while taking.
- All employees riding a motorcycle owned or leased by the Company will wear a protective helmet. In addition, a motorcycle rider must wear a protective helmet while using a personal motorcycle on company business even if state law does not require the use of a protective helmet.
- All Company owned or leased, or client owned or leased vehicles will be operated with headlights on at all times, day or night, and those personal vehicles used by employees for conducting company business or rental vehicles while employee is traveling on company business.
- A 360 degree walk-around inspection of a Company owned or leased or client owned or leased motor vehicle will be conducted by the operator before entering and driving the vehicle and noted on the Daily Checklist. The walk-around inspection will include: condition of vehicle (dents, scratches); headlights operate; taillights operate; brake lights operate; vehicle is not leaking fluids; tires are properly inflated and tire tread does not show excessive wear; all windows are clear of obstructions (ice, snow, dirt); horn operates.
- A Daily Checklist will be completed each day or shift a Company owned or leased, or client owned or leased vehicle is operated. This requirement also affects use of personal vehicles, if used for company business, and rental vehicles while an employee is traveling on company business. The Daily Checklist is to be turned into the employee's supervisor on timely bases (usually at the end of each day), as agreed to by each supervisor. At a minimum, checklists will be turned in once a week.
- Be personally responsible for violations of laws and regulations while driving on Company business and understand that significant violations are subject to disciplinary actions.
- An employee must notify his supervisor immediately if he receives a citation for an illegal motor vehicle operation by a uniformed law officer or a security officer if on a client's private property while operating a Company owned or leased, or client owned or leased vehicle. Additional requirements for those employees holding a Commercial Driver's License are outlined in the Commercial Vehicle Operations and Requirements section of this program.
- An employee must notify his supervisor immediately if he is involved in an accident while operating a Company owned or leased, a client owned or leased vehicle or while operating their personal business on company business. The supervisor will then immediately notify the Corporate HSE of an accident involving a Company owned or leased vehicle. Employee will follow the steps outlined later in this program for accident investigations.
- Employees are required to follow all applicable laws and posted rules of the road whether they are on public roadways or on client owned property.

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- Employees will attend all company required initial driver safety training courses before they will be allowed to drive a Company owned or leased vehicle and all required refresher driver training courses.

Company requirements on Driver Training

Corporate Driver Training requirements on employees who drive on Company business shall:

- Receive “initial” driver’s training that is appropriate for their anticipated level of driving on Company business.

Driver Training level classification:

- Defensive Driving Awareness. (required by all Company employees)
- Defensive Driving Corporate. (required by all Company employees who drive Company provided vehicles.)
- Defensive Driving Heavy Equipment (required by all Company employees who drive large or DOT classified vehicles for the Company.)

Note: Customers may require Employees to attend specific training programs prior to operating a motor vehicle on their property or on their time. Employees are required to fulfill that responsibility accordingly.

Requirements on Fitness to Drive:

Driver fatigue as well as certain medical conditions and/or use of medications may place the health and safety of a Company employee at risk and/or may impact the safety of others when that employee drives a motor vehicle. Operation of any vehicle on Company business while impaired by alcohol (legal limitations are defined by local laws and the Corporate Substance Abuse Policy) or while under the influence of illegal drugs is a violation of Company policy and may be sufficient cause for disciplinary action up to and including termination.

There is no quick fix or easy solution to driver fatigue. Sleep is the principal countermeasure to fatigue.

The guideline for the maximum amount of driving on Company business that should be attempted before or following a full work shift is 250 miles and/or five hours. If the full work shift will or has consisted on “continuous driving,” the guideline for the maximum amount of additional driving on Company business that should be attempted before or after the shift without additional rest is two hours.

Before driving on Company business, all drivers shall:

- Ensure they obtain adequate rest and/or sleep.
- Manage concerns relating to medical condition, medications and/or fatigue using approved Company processes.
- Comply with applicable laws and requirements of Corporate Substance Abuse Policy.

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Managers and Supervisors shall:

- Ensure drivers are afforded the opportunity to obtain adequate sleep before driving on Company business.
- Manage “fitness to drive” and/or “fitness-to-work” issues for workers that have already made long, Company business drives before work.

Requirements on Hand-held Devices and Communication Equipment

The use of telephones and similar hand-held wireless devices (Palm Pilot, pagers, etc.) as well as other communication equipment, while driving is a hazard (distraction) and cannot be done without increasing risk (i.e., use of hand-held devices could interfere with a driver’s ability to recognize other potential hazards and/or properly control the vehicle.)

All Company employees who drive on Company business shall:

- Install and use “hand-free” devices (if applicable) if telephones and/or other communications equipment must be utilized when driving.
- Minimize the use of any communication equipment while driving, even if “hand-free devices are employed.
- **NEVER text while driving!**
- Remember to follow Client policies when on Client property or time.

Requirements on Seat Belts:

All drivers and passenger shall:

- Use seat belts while driving or being driven in Company-provided vehicles, rental vehicles and other types of land transportation that have seat belts available while on Company time.

Requirements on Company provided Vehicles:

Use of Company-provided vehicles for use other than Company business is prohibited without corporate management authorization. Drivers shall:

- Be employed by the Company either part-time or full-time
- Be 18 years of age or older
- Only transport Company employees or Customers in Company provided Vehicles. (Family members and friends are not allowed to ride in Company provided Vehicles.)
- Operate Company provided vehicles for company business only. Personal business shall be performed in personal vehicles.
- Operate Company-provided vehicles safely and maintain them in accordance with manufacturer’s recommendations as well as any additional Company specific requirements. (used only for their intended purpose)
- Carry any state-required documents such a vehicle registration, “Proof of Insurance” card, etc. in the vehicle.
- Each vehicle contains a GPS device. You may not touch, remove, disable, damage or otherwise tamper with any device pre-installed in each vehicle. Tampering with these devices can result in losing the privilege of using a company vehicle, replacement costs being assessed to the employee responsible for the violation and/or termination of employment. Also, you may not remove, damage or obstruct the view of any Company logos placed on the company vehicle.

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Citations received while in a Company vehicle

- Citations received by employees while in a Company vehicle (owned, rented or leased) shall be the responsibility of the employee who receives the citation. Any employee receiving a citation by camera that is mailed to the Company to remit payment **shall be payroll deducted**. Discipline shall be enforced as follows:
 - 1st Offense – Verbal Warning
 - 2nd Offense – Written Warning
 - 3rd Offense – Employee is no longer allowed to drive a Company vehicle

Requirements on Maintenance and Repairs:

Employees are responsible for maintaining Company-provided vehicles (safe and efficient mechanical working order as well as appearance). Vehicles should be serviced and receive minor maintenance whenever possible, using products which follow manufacturer's guidelines and recommendations.

Drivers shall:

- Ensure that the correct fuel is used in vehicles.
- Ensure pollution controls or safety devices and equipment are not removed or tampered with.
- Ensure that vehicles in need or repair are not operated.
- Ensure that vehicles with applicable warranties are serviced and maintained by manufacturer-authorized dealers or shops.
- Coordinate major repairs and/or Company-owned vehicle replacement through Management.

Requirements on Incident Management:

Incidents involving Company-provided vehicles, rental vehicles will be managed using the Incident/Accident Flowchart.

The Company reserves the right to fully investigate any incident involving company personnel and vehicles. The procedures described below define the systematic approach we will use.

The Company believes strongly that incident investigation begins right at the scene. That means certain driver responsibilities must be carried out at the scene of an accident. Additional company procedures involved in accident investigation are described below.

Company policy is that any driver who leaves the scene of an accident (without permission to do so from an authorized company official or without due cause) will be subject to the progressive disciplinary action, up to and including termination, depending on the circumstances involved.

Immediately report all incidents to the Corporate HSE Department and line of command. (i.e., manager or supervisor)

Before communicating an accident, drivers for the Company are expected to gather the following information and details:

- Exact time and location of the accident,
- Estimate of the injuries (if any) and/or damage to vehicle(s) and property involved,

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- A location and/or phone number where you can be reached for further information and instructions,
- Names and addresses of all persons involved in the accident,
- Names and addresses of all insurance companies involved, and
- Make, model, and license numbers of all vehicles involved in the accident.
- Names and addresses of any witnesses to the accident.
- Complete the Corporate Vehicle Accident form provided inside the Company vehicle for you to use at the scene of an accident.
- Supervisors are to use the Vehicle Accident Report Form supplied by HSE. Employees must understand the significance of effective accident investigation, and be aware of specific issues on which the Company will focus its attention. Most importantly, they need to know what changes in behavior are necessary to prevent accident recurrence. Generally, five major areas are evaluated in accident investigation. These areas will be examined in full after an initial evaluation is made of the severity of the accident.
- After an initial contact with the driver of the vehicle involved in an accident, Corporate HSE will determine the level of official involvement that needs to happen in the specific instance.
- A Supervisor, HSE Staff or an insurance adjuster representing the Company may be sent to the accident scene to assist in on-site investigation and handling of the accident details.

Commercial Driver License Requirements

Drivers need Commercial Driver's License (CDL) if they are in interstate, intrastate, or foreign commerce and drive a vehicle that meets one of the definitions of a Commercial Motor Vehicle (CMV). The Federal standard requires States to issue a CDL to drivers according to the following license classifications:

- Class A – Any combination of vehicles with a Gross Vehicle Weight Rating (GVWR) of 26,001 or more pounds provided the GVWR of the vehicle(s) being towed is in excess of 10,000 pounds.
- Class B – Any single vehicle with a GVWR of 26,001 or more pounds, or any such vehicle towing a vehicle not in excess of 10,000 pounds GVWR.
- Class C – Any single vehicle, or combination of vehicles, that does not meet the definition of Class A or Class B, but is either designed to transport 16 or more passengers, including the driver, or is placarded for hazardous materials. (383.23)

Commercial Motor Vehicle Commercial Motor Vehicle means any self-propelled or towed motor vehicle on a highway in interstate, intrastate or foreign commerce to transport passengers or property when the vehicle:

- Has a gross vehicle weight or gross combination weight rating, or gross vehicle weight or gross combination weight, of 10,001 pounds or more, whichever is greater
- Is designed or used to transport more than 8 passengers, including the driver, for compensation
- Is designed or used to transport more than 15 passengers, including the driver, and is not used to transport passengers for compensation
- Is used in transporting material found by the Secretary of Transportation to be hazardous under 49 U.S.C. 5103 and transported in a quantity requiring placarding under regulations prescribed by the Secretary under 49 CFR, subtitle B, chapter I, subchapter C. (390.5) 2.14.2

Requirements for Commercial Vehicle Operators

All commercial vehicle operators, even those not required to have a CDL, are still required to have:

- Driver Qualification File on record for each driver
- All drivers must have a Medical Card and examination.

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- If driving over 100 miles air-mile radius or driving over 12 hours on a day or unable to return to dispatched location, drivers needs to carry a Daily Log Book.

Requirements for Commercial Vehicles

All commercial vehicles are required to comply with regulations that are related to the vehicle and its operations:

- Each vehicle will have a Daily Vehicle Inspection Report (DVIR) with a copy of the last inspection (yesterdays or last time moved) in the vehicle.
- A Maintenance File in the office on each vehicle, with records covering the last year.
- Markings which include name or trade name and US DOT ID number must be on both sides of the commercial vehicle, readily legible at a distance of 50 feet during daylight hours.

Reporting Requirements for CDL Holders

The Motor Carrier Safety Improvement Act (MCSIA) of 1999 requires a CDL holder to be disqualified from operating a commercial motor vehicle if the CDL holder has been convicted of certain types of moving violations in their personal vehicle.

- If your privilege to operate your personal vehicle is revoked, cancelled, or suspended due to violations of traffic control laws (other than parking violations) you will also lose your CDL driving privileges.
- If your privilege to operate your personal vehicle is revoked, cancelled, or suspended due to alcohol, controlled substance or felony violations, you will lose your CDL for 1 year. If you are convicted of a second violation in your personal vehicle or CMV you will lose your CDL for life.
- If your license to operate your personal vehicle is revoked, cancelled, or suspended you may not obtain a “hardship” license to operate a CMV.

Other CDL rules adopted by the Federal and State governments that affect drivers operating CMVs are:

- You cannot have more than one license. If you break this rule, a court may fine you up to \$5,000 or sentence you to jail.
- You must notify your employer within 30 days of conviction for any traffic violation (except parking). This is true no matter what type of vehicle you are driving.
- You must notify your employer within two (2) business days if your license is suspended, revoked, or canceled, or if you are disqualified from driving.
- You must give you’re your employer information on all driving jobs you have had for the past 10 years.
- No one can drive a commercial motor vehicle without a CDL.
- You must be properly restrained by a safety belt at all times while operating a commercial motor vehicle. The safety belt design holds the driver securely behind the wheel during a crash, helping the driver to control the vehicle and reduces the chance of serious injury or death.
- It is illegal to operate a CMV if your blood alcohol concentration (BAC) is .04% or more. If you operate a CMV, you shall be deemed to have given your consent to alcohol testing.
- You will lose your CDL for at least 60 days if you have committed two serious traffic violations within a three-year period involving a CMV. For at least 120 days for three or more serious traffic violations within a three-year period involving a CMV.
- Serious traffic violations are excessive speeding (15 mph or more above the posted limit), reckless driving, improper or erratic lane changes, following a vehicle too closely, traffic offenses committed in a CMV in connection with fatal traffic accidents, driving a CMV without obtaining a CDL or having a

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CDL in the driver's possession, and driving a CMV without the proper class of CDL and/or endorsements.

- You will lose your CDL for a period of 60 days to one-year for violations of a federal, state or local law or regulation pertaining to one of the offenses at a railroad-highway grade crossing.

Idling

The following should be followed by all Company personnel driving Company provided vehicles; or while driving personal vehicles while performing business for the Company.

- A vehicle equipped with air brakes may be left idling while the driver puts wheel chocks in place. No exception to procedure is required.
- A vehicle without air brakes shall NOT be left idling while the driver puts wheel chocks in place, but may be left idling to perform its work function without a driver behind the steering wheel after-chocks are in place. No exception to procedure is required.
- No other vehicles can be left idling at any time without a driver behind the steering wheel.
 - Exceptions to this Procedure can only be granted for extreme weather and must be approved.

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Addendum

Journey Management Considerations

- These Considerations should be reviewed with before driving on company business. A copy of the plan is readily available at the Corporate office and on the Safety Portal. A copy of the plan should also be located in the Company vehicle. Road journeys should only be taken when necessary. Try to complete multiple tasks in single trips to reduce the amount of driving for improved safety and efficiency. If the trip is being taken to meet with someone, determine if the meeting can be done over the phone instead. Consider safer methods of travel (air, train, etc.) where practicable.
- Driving should be done during daylight hours rather than after dark whenever possible. Reduce speed when driving at night. Be aware of the potential for wildlife to be on the road, especially when driving at dusk or dawn.
- Before leaving on a trip, ensure that weather conditions are safe for driving. Ensure the vehicle being used is adequate for the weather conditions. Make sure emergency supplies are in the vehicle, and the driver has a cell phone in case of emergency. In particularly harsh conditions, consider canceling or rescheduling the trip.
- Before taking a trip to an unfamiliar location ensure that you have printed driving directions available. Do not plan to read directions from a smartphone while driving. A GPS device may be used, but printed directions should be kept as a back-up.
- Employees should notify their supervisor or another individual who is not traveling with them of their travel plans. This includes where they are going, when they should be getting there, and when they plan to return.
- Drivers should always carry a cell phone, especially when traveling in rural areas.
- When driving long distances, sufficient breaks should be taken to prevent fatigue. When driving alone and having trouble staying awake, pull off the road and get out of the vehicle for fresh air, or take a power nap. If driving late at night, consider getting a hotel room and starting fresh the next day. If two licensed drivers are in the vehicle, take turns driving. Get plenty of rest before beginning your journey.
- Roadside emergency kits should be kept in all vehicles used for highway travel. These kits shall include equipment to assist in a roadside emergency such as water, booster cables, first aid supplies, warning triangles, flashlights, etc. If there is a potential for snow and ice, carry sandbags and a shovel.

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To aid in determining whether or not a trip is safe to proceed on the following checklist should be used:

Journey Management Criteria – Point/Scoring Allocations				
1	Hours of sleep in last 24	>8	4 - 8	<4
2	Are you taking medications that could impair your ability to operate a motor vehicle?	No		Yes
3	Visibility (dawn, dusk, sleet, snow, fog, clear, etc.)	Good	Fair	Poor
4	Road surface condition/weather conditions	Good	Fair	Poor
5	Anticipated Driving Time	< 2	2 - 6	> 6
6	Has enough time been allotted for you to make this trip?	Yes		No
7	If this trip is to a place of rest (after a full work day), what is the anticipated driving time?	< 1 hour	< 2 hours	> 2 hours
8	Is the trip essential?	Yes		No

- 1 or More RED answers warrant additional driver critique / intervention to ensure a safety journey (e.g. frequent rest stops, reevaluation mid-trip, swap-out of drivers, seeking further input from knowledgeable management / supervision
- 2 or more YELLOW answers warrants additional driver critique / intervention to ensure a safe journey as noted above.
- All GREEN answers = Proceed and reevaluate as conditions change.
- As the responsible driver, you shall ensure the above checklist items have been considered prior to embarking on the journey and as part of your pre-job JHA.

Related Items to Remember / Consider:

- Is your vehicle in proper working condition / equipped to make the journey safe?
- Has a 360 vehicle walk-around been performed?
- Is seasonally appropriate clothing and emergency supplies aboard?
- Is there a means to make contact should an emergency arise?
- Is someone aware that you are beginning this trip and will make sure you arrived safely?