



Commercial Fleet Safety Program

Scope

This program outlines the policies and procedures that we have in place to ensure driver safety and compliance with the regulations pertaining to commercial vehicles as they are used to conduct company business.

This policy focuses on CDL Regulated individuals driving commercial vehicles. The objective of this policy is to reduce or eliminate motor vehicle accidents and associated injuries by following the safe practices established in this program.

Compliance with this program is mandatory for all company commercial drivers. Violations of this program may result in disciplinary action up to and including suspension of driving privileges or termination. Any deviations from this program must be immediately brought to the attention of Supervision and the Director of Education and Loss Prevention.

Program Responsibilities

Management

Management is responsible for providing the tools and resources necessary to implement this program and for ensuring all employees follow the provisions of this program.

Management shall:

- Implement the Motor Vehicle Safety Program in their areas of responsibility.
- Establish measurement objectives to ensure compliance with the program.
- Provide assistance and the resources necessary to implement and maintain the program.

Supervisors

Supervisors shall:

- Investigate and report all accidents involving a motor vehicle used in performing company business. Forward all accident reports to the Program Administrator.
- Be responsible for taking appropriate action to manage high-risk drivers as defined by this program.

Program Administrator

The Director of Education and Loss Prevention is E Light Electric Services Inc.'s Program Administrator. The Program Administrator has the authority to delegate administrative tasks to designated persons as needed to ensure compliance with this program.

The Program Administrator is responsible for:

- Evaluating prospective company drivers.
- Maintaining an accurate qualified drivers list.
- Maintaining accurate qualification records.



- Maintaining accurate substance abuse testing records.
- Ensuring company vehicles are maintained mechanically.
- Selecting/procuring all company vehicles.
- Ensuring all qualified drivers are trained in the safe operation of commercial vehicles.
- Monitoring drivers to ensure compliance with all elements of this program.
- Making recommendations about retention or release of employees based on driving tests from the designated driver trainer.

Driver Trainer(s)

Qualified and Designated Supervisors shall function as the company driver trainers. E Light Electric Services Inc. Driver Trainers are responsible for:

- Conducting on-road driving tests for new employees and existing employees at least annually.

Commercial Drivers

- Meet all minimum qualification criteria.
- Be medically qualified to drive a commercial motor vehicle (defined under 391.41: Physical qualifications for drivers).
- Maintain satisfactory evaluations from the company's driver trainer.
- Receive negative drug/alcohol test.
- Maintain an acceptable motor vehicle record (MVR).
- Drivers involved in intra or interstate operations with GMVR of 26,001 pounds or more must have a CDL license and be enrolled in a DOT Drug and Alcohol Testing Program.

Driver Qualifications Criteria

Driver applicants will not be considered for employment unless they meet the minimum requirements listed below.

- Possess a valid non-commercial driver's license with at least two years driving experience.
- Be at least 21 years old to operate a commercial motor vehicle interstate.
- Be able to read and speak English sufficiently to converse with the general public, to understand highway traffic signs and signals, to respond to official inquiries, and to make entries on reports and records.
- Be physically and mentally qualified to drive a company vehicle and possess a valid medical certificate as defined in 49 CFR Part 391.
- Possess a current and valid commercial driver's license and proper endorsements for the type of commercial vehicle to be driven.



- Must not be disqualified to drive a commercial motor vehicle under the rules and regulations set forth in 49 CFR Part 391.15.
- Meet all of the requirements and be able to perform all of the tasks and essential duties of the job description.
- Have at least two years of verifiable driving experience with like-type vehicles.
- Have at least five years of verifiable driving experience, if required to transport hazardous materials.
- Has not been convicted of any of the following major violations:
 - Being under the influence of alcohol as prescribed by state law.
 - Being under the influence of a controlled substance.
 - Having an alcohol concentration of 0.04 or greater while operating a CMV.
 - Refusing to take an alcohol test as required by a state or jurisdiction under its implied consent laws or regulations.
 - Leaving the scene of an accident.
 - Using the vehicle to commit a felony.
 - Driving a CMV when, as a result of prior violations committed operating a CMV, the driver's CDL is revoked, suspended, or canceled, or the driver is disqualified from operating a CMV.
 - Causing a fatality through the negligent operation of a CMV, including but not limited to the crimes of motor vehicle manslaughter, homicide by motor vehicle, and negligent homicide.
 - Using the vehicle in the commission of a felony involving manufacturing, distributing, or dispensing a controlled substance.
- Has not been convicted of any of the following serious violations:
 - Speeding excessively, involving any speed of 15 mph or more above the posted speed limit.
 - Driving recklessly, 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.
 - Making improper or erratic traffic lane changes.
 - Following the vehicle ahead too closely.
 - Violating state or local law relating to motor vehicle traffic control (other than a parking violation) arising in connection with a fatal accident.
 - Driving a CMV without obtaining a CDL.
 - Driving a CMV without a CDL in the driver's possession.



- Driving a CMV without the proper class of CDL and/or endorsements for the specific vehicle group being operated or for the passengers or type of cargo being transported.

Hiring Process

The employment hiring process is designed to ensure that the safest individuals are hired to operate our motor vehicles. This multi-step process shall be used for all applicants and will be administered uniformly without bias toward race, color, religion, gender, age, national origin, disability, sexual orientation, or any other criteria deemed unlawful by state, federal, or local law.

Application

All commercial driver applicants must submit a completed, accurate, signed, and dated application for employment. The hiring/screening process will not continue until all information on the application has been verified.

The application shall include:

- name, address, phone number, email, social
- residence history for at least the past 3 years
- work history for at least the past 3 years PLUS 7 YEARS (A TOTAL OF 10 YEARS) OF DOT SAFETY SENSITIVE JOBS
- A checkbox for each previous position to clarify if a job is safety-sensitive, If the driver isn't sure, it will be assumed that it was safety sensitive and the verification process shall be conducted for that position. The driver must account for gaps in employment for the required 3+ years.
- driver's history (license, accidents, violations) and the driver's signature and date.
- Inquiry if driver has ever failed pre-employment drug test and was denied employment.

Previous Employment

Employment history will be collected and verified for every commercial driver applicant. All commercial driver applicants must provide this employer information on all driving positions they have held for the previous ten years:

- Names, addresses, phone numbers, or other contact information of previous employers.
- Names, titles, phone numbers, or other contact information of previous supervisors.

Motor Vehicle Records

The driving record from the previous five years will be examined for all commercial driver applicants from the appropriate agency of every state in which the applicant held a motor vehicle license or permit. The driver qualification and hiring process will not continue until all driving record information has been verified and no disqualifying violations have been found (see driver qualification criteria above).

Drug and Alcohol History



All applicants will be asked if he or she has tested positive, or refused to test, on any pre-employment drug and alcohol test administered by a previous employer. If the applicant admits to any of the above, without documented successful completion of DOT return-to-duty requirements, he or she will not be considered for employment.

All applicants who indicate no drug or alcohol violations must provide written consent for a drug and alcohol history to be obtained for the preceding two years from all DOT-regulated employers. If the applicant fails to provide this consent, he or she will not be considered for employment. Any positive indication of drug or alcohol use at the following levels will immediately disqualify the applicant:

- Alcohol test with a result of 0.04 or higher
- Verified positive drug test
- Verified adulterated or substituted drug test results
- Violations of DOT agency drug and alcohol testing regulations.

Applicants who have successfully completed DOT return-to-duty requirements after a drug or alcohol regulation violation will continue through the hiring process.

Pre-Employment Screening Program

All applicants must provide written approval for E Light Electric Services Inc. to request a copy of the applicant's commercial driving record from the FMCSA's Pre-Employment Screening Program. Non-compliance with hours of service, cargo securement, vehicle inspections, etc. will be evaluated in the hiring process. Significant or repeated violations may disqualify the applicant. When an applicant attempts to apply, renew, or update his or her CDL, E Light Electric Services Inc. will request the state perform a check of its databases, the Commercial Driver's License Information System, and the National Driver Registry to ensure the driver is not disqualified in that state or another jurisdiction or does not possess a commercial license from more than one jurisdiction.

Background and Fair Credit Reporting Act Investigations

All applicants must provide written approval for E Light Electric Services Inc. to perform a criminal background check and a credit report check. These checks will be made on all commercial driver applicants and other applicants who may be required to operate a motor vehicle while conducting company business.

Proof of Citizenship and Right to Work

All commercial driver applicants shall be required to provide either proof of U.S. citizenship or proof of their legal right to work in the United States.

Personal Interviews

All applicants will be interviewed in person by the program administrator.

Drug/Alcohol Screening

All commercial driver applicants will submit to a drug/alcohol screening before an initial offer of employment is extended. Only the E Light designated drug/alcohol testing facility will be used.



Drug/alcohol test results from the commercial driver applicant's previous employer will not be accepted. A negative test result is a condition of employment. No driver applicant will perform any work or activity until a negative test result has been obtained for the driver applicant.

A commercial driver may be required to take a DOT-regulated controlled substance/alcohol test for any of the following:

1. Pre-employment (drug only).
2. Reasonable Suspicion: Drivers will be required to take a test when the Company requests it with good cause.
3. Random: The Company program must randomly test at least half of the drivers each year for drugs and 25% for alcohol.
4. Post-Accident: Drivers involved in reportable accidents must be tested within 32 hours of the accident for drugs and 2 hours for alcohol.
5. Return-to-Duty & follow-up: Drivers who are returned to work after successfully completing the E Light Electric Inc. Return to Work process (which includes being evaluated by a Substance Abuse Professional and additional random testing).

Be advised that marijuana remains a drug listed in Schedule I of the Controlled Substances Act. It is unacceptable for any employee subject to drug testing under the DOT's drug testing regulation to use drugs or alcohol medicinally or recreationally.

For any non-DOT triggered testing event, employees may still be tested under E Light Electrical Services Drug and Alcohol Policy.

Medical Qualification

All applicants shall be medically examined and certified as physically qualified to operate a commercial motor vehicle by a licensed, DOT-certified medical examiner designated by E Light Electric Services Inc.

Driving Evaluation

All applicants will be required to submit to a driving test to evaluate their driving proficiency. The driving test will be an on-road driving test with a designated driver trainer. The applicant will be evaluated on pre-trip inspections, city and rural driving on two-lane and multiple-lane roads including freeway and interstate, passing, backing, and emergency procedures. This evaluation will be used in the hiring assessment and to develop portions of the company's mandatory driver training program. This driving test will be completed before a new commercial driver is allowed to operate a commercial vehicle for company business. Driving evaluations will be documented on the driver's road test examination.

Hours of Service

Short Haul Drivers (Within 150 air-mile Radius)

- The maximum duty period is 14 hours.
- A driver is considered a "Short Haul Driver" under the following:
 - Operate within a 150 air-mile radius.
 - Not exceed a maximum duty period of 14 hours.



- Start and end shift in the same location.
- Have at least 8 hours off (passenger) or 10 hours off (property) between shifts.
- Include on a daily time record:
 - The start and end times for the day
 - The total number hours on-duty.
- E Light Electric Services Inc. shall record the driver's time in, time out, and total number of hours per day.
 - Records shall be maintained for 6 months.
 - For new hires or drivers used intermittently time record must include the total time for the 7 preceding days.
- Should a driver no longer meet the exception (drives too far/works too many hours), the driver must complete a regular log.
 - If driver is required to complete a log:
 - 8 or fewer days within the last 30 days ► driver can use paper log with a graph grid.
 - More than 8 days within the last 30 days ► driver must use an ELD to record time for that day.

Driver Training

Orientation

During orientation, commercial drivers will be introduced to all documents, rules, procedures, and policies used by commercial drivers, many of which are included in this Commercial Fleet Safety Program. During driver orientation, drivers will be introduced to company facilities and will be provided with area access security codes and keys as needed. Drivers will also be introduced to personnel with whom they will interact during the course of their employment with E Light Electric Services Inc. All drivers will be provided with a list of contacts and telephone numbers.

Employment Documentation

E Light Electric Services Inc. uses a variety of forms and other record-keeping documents, including, but not limited to vehicle inspection reports, manifests and bills of lading, log books, fuel, and other vehicle service and maintenance receipts. The driver shall be trained on these requirements during orientation.

Driver Safety Rules

Commercial drivers are responsible for complying with all driver safety rules. Driver safety rules include:

- Do not operate the vehicle unless all occupants are wearing a seat belt.
- Do not drive the vehicle without headlights illuminated.
- Do not allow any unlicensed/unauthorized persons to operate a company motor vehicle.



- Do not operate any vehicle while impaired, affected, or influenced by alcohol, illegal drugs, medication, illness, fatigue, or injury.
- Do not engage in distracting activities while driving. This includes using a cell phone for talking or texting; eating; using a computer, GPS or media player; applying makeup; reading; looking at maps; or any other activity that takes a person's eyes or attention away from driving. Drinking non-alcoholic beverages is acceptable.
- Do not use a radar detector.
- Obey the posted maximum and minimum speed limits at all times.
- Do not pick up hitchhikers or allow unauthorized passengers inside the motor vehicle.
- Do not drive a motor vehicle that is mechanically unsafe to operate.
- Do not operate a motor vehicle with unsecured cargo or equipment.
- Move to another traffic lane or slow down when approaching an emergency vehicle along the side of the roadway.
- Observe all state and local laws while operating the motor vehicle.
- Do not accept payment for carrying passengers or materials not authorized by the company.
- Do not push or pull another vehicle or tow a trailer without company authorization.
- Do not transport flammable liquids and gases without prior authorization. If authorized, only DOT- or UL-approved containers are to be used, and only in limited quantities when necessary.
- Do not use ignition or burning flares. Use only issued reflective triangles.

These rules will be reviewed annually and signed by each commercial driver. The signed copy will be maintained in the driver's file. Disciplinary action up to and including termination may result if drivers fail to comply with the driver safety rules.

Driver Safety Notices

E Light Electric Services Inc. will post safety notices, regulatory changes, procedure changes, and any traffic/road condition reports in the following locations:

- The main office.
- Driver dispatch location.
- E Light Information website (www.elightinformation.com)

Individual Driver Training

E Light has developed and adopted a policy that all commercial drivers complete mandatory training before operating company vehicles. Training is conducted and includes both classroom and road training. The total length of the training depends on each driver completing all course objectives.

Upon the completion of training, the driver trainer will make a recommendation to the program administrator to either retain or release the new driver. In some cases, a driver undergoing



training may not be allowed to complete the training. This usually occurs if, in the opinion of the driver trainer, the driver poses a safety liability to E Light Electric Services Inc.

At least annually, a driver trainer will ride with each commercial driver to evaluate his or her operation of a commercial motor vehicle. Results will be documented on the driver's road test examination. The results of this evaluation may indicate a need for additional training with a driver trainer. Moving violations and/or accidents may also trigger additional training throughout the year.

Division (Group) Driver Training

All commercial drivers must attend required training. This training will consist of a review of company procedures, updates on regulatory changes, safety topics such as defensive driving, driver fatigue, discussion of current issues, and a review of all accidents, incidents, and citations. All group training will be documented on the training record/certification form.

Vehicle Observation

The program administrator or his designee will conduct random unannounced vehicle observations of company drivers during their operations. The observations will be documented and the records retained in the driver's file.

Criteria for Maintaining Employment

Each authorized driver must comply with the criteria below in order to maintain status as a qualified commercial driver and be authorized to drive a commercial motor vehicle. Failure to comply with any of the following conditions will automatically disqualify a driver from operating a commercial motor vehicle.

Licenses

All drivers must maintain the proper commercial driver's license (CDL) for their job duties. Drivers will not possess more than one state-issued license.

Traffic Violations

Drivers must notify the program administrator within **48 hours** of conviction of any traffic violations (except parking). Drivers must also notify the motor vehicle licensing agency in the state that issued his or her CDL within 30 days. These requirements apply to any motor vehicle the driver was operating at the time the violation was received, regardless of who owns the vehicle.

Drugs/Alcohol

Drivers will not operate a commercial motor vehicle with a blood alcohol concentration of 0.04% or more or while under the influence of legal or illegal drugs that impair the operation of the motor vehicle. The sale, purchase, transfer, or possession of any controlled substance (except medically-prescribed drugs) are strictly prohibited while using a company vehicle, while on the company premises, or while engaged in company business.

Suspensions/Revocations



Drivers will not operate a commercial motor vehicle if their license is suspended, revoked, or canceled, or if they are disqualified from driving. The driver must immediately notify the program administrator if their license is suspended, revoked, or canceled.

Motor Vehicle Records

The program administrator will check the motor vehicle records (MVR) of all authorized commercial drivers annually. All annual reviews will be documented and maintained in the driver qualification file. Disciplinary action, up to and including termination, can result if a motor vehicle record indicates non-compliance with the driver qualification criteria.

CSA Program

The Federal Motor Carrier Safety Administration's Comprehensive Safety Accountability (CSA) tracks violations by company specific DOT numbers. It is very important that all drivers understand how their driving affects not only their safety record, but the company's, as well.

The program administrator will review the CSA safety report each month and address areas where safety has diminished across the company. The program administrator or his designee will review the daily inspections. This may result in additional safety training or changes in drivers' status.

Driver Qualification Files

As required by the DOT, E Light Electric Services maintains a qualification file for all drivers. No employee shall operate a company vehicle or any personal vehicle while on company business unless they're listed on the company's qualified driver list. This includes personal vehicles if used for company business.

E Light Electric Services maintains a current list of qualified drivers and is required to provide this list to our insurance carrier annually and anytime changes are made to the list. This information is required for each driver:

Driver application for employment

- Copy of driver's license.
- Driver Application.
- Hire date.
- Inquiry to previous employers in the past three years.
- Inquiry to state agencies.
- Medical examiner's certificate (medical waiver copy only).
- Driver's road test examination results.
- Certificate of road test*.
- Annual MVR and review of driving record.
- Annual driver's certificate of violations.
- Annual review of driving record.



Qualification records for each commercial driver will be maintained for a minimum of three years after the driver's employment is terminated.

Vehicle Inspections

Driver Pre-Trip Inspection

A properly performed and thorough pre-trip inspection will be conducted by each driver before operating the vehicle. The following seven steps must be completed for each pre-trip inspection. All vehicle inspections will be documented on the driver's vehicle inspection report. If anything unsafe is discovered during the pre-trip inspection, it must be fixed immediately and prior to operation.

1. **Review Last Vehicle Inspection Report** - The driver must review the last driver's vehicle inspection report to verify that any needed repairs were made to the vehicle. If an authorized signature certifies that defects were corrected or that correction was unnecessary, the driver will sign the third signature line of the form. If the defects noted were not acknowledged by an authorized signature, the driver shall not drive the vehicle until the defects are corrected.
2. **Vehicle Documentation** – The driver must verify all shipping paper, insurance cards, and any other paperwork required by the DOT are in his or her possession.
3. **Vehicle Overview** – A general condition review of the vehicle is required. The driver will:
 - Look for damage or unusual wear to the vehicle. Examples include vehicle leaning to one side, lights broken or inoperative, tire and rim condition, and suspension and break wear.
 - Look under the vehicle for fresh oil, coolant, grease, or fuel leaks.
 - Perform a walk-around assessment to look for people, other vehicles, objects, and low hanging wires or limbs.
4. **Check Engine Compartment** – After verifying the engine is turned off, the parking brake is set and/or wheels chocked, the driver will raise the hood and inspect the engine compartment. Check:
 - Fluid levels
 - Power steering
 - Batteries
 - Automatic transmission
 - Belts for cracks or wear
 - Tightness in alternators, water pumps, and air compressor
 - Cracked or worn electrical wiring insulation
5. **Start Engine and Inspect Inside the Cab** – The driver will verify that the parking brake is set, place gearshift in neutral, start engine, and listen for unusual noises. Then check:
 - Gauges (oil, ammeter/voltmeter, coolant temperature, engine oil temperature, warning lights and buzzers)



- The condition of controls. Look for looseness, sticking, damage, or improper setting (steering wheel, clutch, accelerator, brake controls [foot brake, trailer brake, parking brake, retarder controls], transmission controls, inter-axle differential lock, horn[s], windshield wiper/washer, and lights [headlights, dimmer switch, turn signal, four-way flashers, clearance, identification, marker light switches])
 - Condition of mirrors and windshield/windows
 - Location of emergency equipment (three red triangles, properly charged and rated fire extinguisher, tire chains, emergency phone number list, and accident reporting kit).
6. **Check Lights** – The driver will make sure parking brake is set, engine is off, and ignition key is out of the switch and then check these items:
- Headlights (low and high beams)
 - Emergency flashers
 - Parking, clearance, side maker, and identification lights
 - Turn signals
 - Brake lights (a helper will be required to complete this task)
7. **Test Brakes** - The driver will check these additional items:
- Brake drums (or disks), linings, and hoses for cracks or other visible damage, appropriate liner thickness, and presence of oil or grease;
 - Air hoses for worn areas or the presence of cuts or other damage. Shut off the engine and test low pressure warning signal;
 - Verify spring brakes activate with low air pressure (usually in a range between 20-40 psi);
 - Check the rate of air pressure buildup (typically 85-100 psi within 45 seconds in dual air systems);
 - Test air pressure leakage (with a fully-charged air system typically 125 psi);
 - Verify loss rate does not exceed two psi in one minute for single vehicles and three psi in one minute for combination vehicles;
 - Check air compressor governor cut-in and cut-out pressures; and
 - Test parking brake with transmission in low gear. Test service brake for left or right pulling when service brakes are applied.

During a Trip

Once on the road, the driver must examine his or her vehicle and cargo at each:

- Change of duty status
- Stop



If a problem is found, the driver must either have the necessary repairs or adjustments made before operating the vehicle, or safely travel to the nearest repair facility.

During each stop the driver will check:

- Tires, wheels, and rims
- Brakes
- Lights and reflectors
- Brake and electrical connections to trailer
- Trailer coupling devices
- Cargo securement devices

Post-Trip Inspection and Report

Each driver is required to complete a written report on each vehicle's condition at the end of the day or when he or she finishes driving the vehicle for that day. Vehicles include power unit and trailer(s).

The report must be completed in its entirety and the driver must note any defects to:

- Service brakes, including trailer brake connections
- Parking (hand) brake
- Steering mechanism
- Lighting devices and reflectors
- Tires
- Horn
- Windshield wipers
- Rear vision mirrors
- Coupling devices
- Wheels and rims
- Emergency equipment

The driver must also note any other defects that could affect the safe operation of the vehicle or result in its mechanical breakdown. The report must also indicate if no defects are found. The driver must sign and submit the report to the program administrator.

The original copy of the inspection report and certification of repairs will be retained in the vehicle maintenance files. The original copies of inspection reports on which defects were noted and the certification of repairs will be retained for three months.

Vehicle Accident Reporting and Investigation Plan



E Light Electric Services Inc.'s accident reporting and investigating plan describes methods and practices for reporting and investigating accidents. Near-miss accidents or incidents must be reported as well (i.e., when a driver nearly has a vehicle accident but is able to avoid injury or damage).

This program shall function in addition to and in conjunction with E Light's Accident Investigation Program.

Vehicle Accidents

These steps will be followed in the event of a vehicle accident/incident.

- Stop the vehicle, turn off the engine, and protect the scene by activating the four-way emergency flashers and posting orange emergency triangles to prevent a secondary accident (one near the scene, one marker 100 feet in each direction from the scene, and one marker near curves or hill crests, but no more than 500 feet away).
- Call for medical assistance and assist any injured people, if necessary, but do not move the person unless absolutely necessary to prevent further injury.
- Call the police.
- Call the company's program administrator within 12 hours.
- Locate witnesses and get important information from them including names, addresses, and phone numbers.
- Exchange pertinent information with other drivers.
- Take photos of the accident, street signs, landmarks, and/or mile markers.
- Make detailed sketches/drawings of the accident scene, noting the direction of travel for each vehicle involved.
- Complete the vehicle accident report form on iAuditor.

Note: Every company motor vehicle is required to have a vehicle accident reporting kit in the glove box. This kit should be used by the driver to record accident facts after the accident as soon as feasible.

Accident investigation kits are available from the program administrator.

Vehicle Accident Involving Employee Injury/Property Damage Reporting

Our "Vehicle accident involving employee injury/property damage" reporting procedures include:

- E Light Electric Services Inc. is required to test each surviving driver for alcohol and controlled substances as soon as possible following an accident as required by §382.303.
- Employees injured on the job are to report the injury to the program administrator as soon as possible following the incident.



The goal of this reporting and investigation process is not to find fault, but to determine the root cause so corrective actions can be made to eliminate future accidents or incidents.

Vehicle Accident Report Retention

Vehicle accident reports and associated information will be maintained by the program administrator for three years after the date of the vehicle accident. The following information will be retained:

- Date of accident;
- City and state in which the accident occurred;
- Driver name;
- Number of injuries;
- Number of fatalities;
- Whether hazardous materials, other than fuel spilled from the fuel tanks of motor vehicles involved in the accident, were released;
- Copy of vehicle accident report; and
- Copies of all accident reports required by state or other governmental entities or insurers.

Post-Accident Corrective Action Procedure

The program administrator will evaluate driver performance in relation to the driver's training after an accident. The corrective actions outlined below will apply if an accident is determined to have been preventable. Accidents will be reviewed by the program administrator on a case-by-case basis before the corrective action program is initiated.

A driver who is involved in one preventable accident in six months may be placed on probation for 90 days. If probation is implemented and the driver successfully completes that period of probation without any further accidents, the driver will be taken off the probation list; however, if the driver is involved in another preventable accident while still on probation, the driver will be terminated.

E Light also reserves the right to impose more stringent consequences based on the circumstances and/or severity of a preventable accident.

Cargo Securement

Cargo securement is extremely important to the safety of the driver, his or her vehicle, and other vehicles on the road. Loads should be examined within the first 50 miles of initial transport and again at all following stops. All tie-downs, tarps, doors, hatches, blocks/chocks, straps/chains/binders, tires, placards, lights, etc. are to be verified as secure, meaning they cannot damage the cargo or come loose and fall off the vehicle. After the verification has been physically made, it must be reported to the Supervisor.



Traffic and Road Reports

Management and Supervision shall select the safest driving routes. The company will use various tools at their disposal to investigate:

- Road conditions
- Heavy traffic
- Road closures
- Dangerous intersections or roads
- Stops near crests of hills, at blind corners, or on busy roads
- Tunnels, bridges, and overpasses
- Road construction
- Steep grades
- Roads that may have seasonal concerns
- Heavy pedestrian areas

This information shall be posted on www.elightinformation.com

If the road conditions on the driver's route are hazardous, the driver shall not attempt to drive that route.

Law Enforcement Stops/Roadside Inspections/Weigh Stations

E Light expects drivers to behave in a professional and courteous manner when pulled over by law enforcement, going through weigh stations, or if asked to participate in a roadside inspection. Directions given by the official should be strictly followed. Failure to comply with the procedures set forth below may result in disciplinary actions up to and including termination.

Roadside Inspection Procedures

When a driver is required to participate in any of the above actions, he or she must pull off the road immediately to an area designated by the officer. If the driver believes the designated area is unsafe for the driver and/or the officer, the driver will state his or her concerns to the officer in a courteous and professional manner. Once the inspection is underway, the driver shall follow the directions given by the officer and act appropriately.

The results of all stops and inspections must be reported to the company immediately. The driver must turn in all inspection reports to the program administrator.

If the vehicle or driver is placed out of service, the driver must notify the program administrator immediately so he can notify the customer of any delays that may result. A vehicle that is placed out of service cannot be operated until all repairs required by the out-of-service notice have been completed.

Disposition of Report

Upon receiving a roadside inspection report E Light Management will arrange to correct any defects still outstanding. Within 15 days of the inspection, E Light Management will certify that



all defects have been corrected. This will be done when the carrier official signs, dates, and adds his/her title to the inspection report form. The form will then be mailed to the issuing agency at the address indicated on the form.

The driver will be notified when defects have been corrected. Roadside inspection reports will be analyzed for ways to reduce the number of violations and out-of-service rate. A copy of the roadside inspection report will be retained for three years.

Periodic Program Review

At least annually, the program administrator or his designee will conduct a program review to assess the progress and success of the program. The review will include:

- Review of individuals driving compared to the qualified drivers list
- Re-evaluation of all training programs and records
- The need for retraining of management and/or drivers based on accident investigation results
- Review of drivers involved in a high number of vehicle accidents
- Responsiveness in reporting vehicle accidents
- Vehicle purchases and safety equipment contained on the vehicles.

The program's success will be determined and reported to senior management using this criteria:

- Cost and frequency of vehicle accidents;
- Employee feedback through direct interviews, audits, and questionnaires; and
- Vehicle accident investigation results.