

Safety Policy and Procedures Manual



STI Safety Council
Student Transportation, Inc.
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Our Safety Culture

STA/STC is dedicated, above all else, to the safety of its student passengers, its employees and the public with whom we share the road each day. The Company's approach to safety is based on behavior and results rather than regulations. Therefore, we are encouraged to collectively raise the bar beyond local regulatory requirements when it will serve the best interests of safety. In summary, the "strictly local" aspects of any branch or regional safety program should always serve to enhance common best practices, rather than to dilute them.

It is the Company's belief that the principles embodied in the Company's behavior-based approach to safety should be experienced by its employees, customers and, most of all, its student passengers in the form of a common culture throughout the operation. For example, a driver transferring between local branches, or even between regions, would be expected to notice only those differences in safety policy and procedures necessitated solely by local regulatory or customer requirements.

Accordingly, our daily activities shall proceed with the understanding that, despite some regional/jurisdictional differences, there is a set of best practices that should be applied to all Company branches. The identification and implementation of these best practices shall be undertaken in the broadest context, with an eye towards holding local considerations/exceptions to an absolute minimum. In the following chapters, the STA/STC Safety Council has identified best practices relating to safe operations that have been proven effective in various branches of our Company.

There is an important role in this program for each employee, and everyone is expected to join together to make STA/STC a successful, accident-free and healthy place to work.

Driver Qualification and Hiring

STA/STC believes that our employees are our most valuable assets and that the success of the Company is determined by the quality of its employees. Therefore, the Company is committed to employing only the best and most qualified drivers. This commitment guides our selection and approval of applicants as they move through each step of the training and hiring process. STA/STC has established the following procedures for driver qualification and hiring.

Responsibility

All Branch Managers, Safety Trainers and others involved in the hiring process must be familiar with and apply all hiring standards set forth in this policy. Each employee candidate, including rehires, must complete an application for employment. The application must be reviewed and initialed by the Branch Manager, or equivalent, prior to any offer of employment. Applications will expire within thirty (30) days from the date of the application.

Each candidate must be compared against the criteria set forth with no variations. Based on this policy, each candidate must be treated equally and consistently by the parties involved in the selection and

screening of driver applicants. Each candidate, who meets the hiring criteria, must be interviewed by a member of management, as designated by the Branch Manager, prior to any conditional offer of employment. Evidence of such interview must be included in the employee's personal file, including the name of the interviewer and the date it was conducted.

Procedures

STA/STC's driver hiring qualification standards and procedures have been developed to help ensure that drivers share STA/STC's values and goals of operating in a safe, legal and professional manner.

STA/STC's standard is a minimum age requirement of 21 years of age to operate a Company motor vehicle registered to transport students.

STA/STC requires that all driver applicants have a minimum of three (3) years of verifiable driving experience.

STA/STC's hiring standards necessitate that new driver applicants (those with no prior school bus driving experience) with any preventable motor vehicle accidents within the past three (3) years will not be considered for employment. All new "experienced" driver applicants (those with a current CDL) with more than one (1) preventable motor vehicle accident within the past three (3) years will not be considered for employment. Any preventable accidents on record at the time of hire may be considered in the determination of continued employment in the event of future preventable accidents or moving violations.

Any driver applicant with a moving violation or a preventable accident in excess of three (3) years that resulted in a fatality or an injury requiring hospitalization, to any party, must be reviewed and approved by the Regional Vice President, who may authorize such hire by initializing that driver's application.

STA/STC's hiring standards also require that only those driver applicants with no more than two (2) moving violations within the past three (3) years will be considered for employment. An applicant who has incurred more violations than the above standard has demonstrated a pattern of unsafe driving behavior that is unacceptable in any prospective driver associate.

STA/STC will not consider any driver applicant who has been convicted of a criminal offense involving a commercial vehicle.

STA/STC will not consider for employment any driver applicant who has been convicted of an offense involving the operation of a motor vehicle while impaired or under the influence of alcohol or controlled substances, or any such equivalent local, state, federal or provincial offense, with the exception that a driver applicant with a previous DUI conviction may be considered for employment with STA/STC only if the following conditions are met:

- The applicant is currently employed as a school vehicle operator with all required current credentials.
- The DUI conviction or equivalent state or provincial offense must have occurred at least 15 or more years ago.
- The offense did not result in an accident, death or injury to another person.
- The offense did not occur in a school vehicle or in a private motor vehicle while the driver held a school vehicle license.
- That the DUI offense be considered along with the MVR and criminal background review as a package to rule out any negative behavioral trends.

- The offense must be discussed openly by the Terminal/Branch Manager and the applicant as part of the final interview process. The manager should feel confident that this incident was a one-time poor decision and that there is no chance of a repeat. This interview should be documented on the Applicant/Manager DUI Interview form (available in the *Forms and Addenda to Best Practices Manual* section of this book) and included with the driver's official file.
- The final decision to hire must be approved by the Regional Vice President of Operations. Their signature authorizing this hire must be included on the Applicant/Manager DUI Interview form.

New drivers to the industry with prior DUI convictions will still be excluded from employment consideration. CDL applications without school vehicle experience will be treated as inexperienced drivers. An applicant with more than one DUI conviction will not be considered for hire at any time under any conditions.

Clearances

Before drivers are allowed to transport students for STA/STC, they must have certain acceptable clearances. This may include, but not be limited to, the following:

- Motor Vehicle Record (MVR)
- Criminal records check
- FBI background check
- Negative drug test results
- Current physical exam
- Negative TB test results
- Successful passing results of written and driving skills tests
- Completed training in the type of vehicle they will drive
- Demonstrated proficiency in vehicles qualified to drive
- All other clearances, as required

Use of Criminal History in Background Checks

Whenever it is necessary to use an employee's or applicant's criminal history in connection with an employment decision or action, the decision maker will:

- Look first to any federal, state/provincial or local governmental regulations and/or licensing restrictions that may serve as an absolute disqualification from service in the contemplated position.
- Look second to any written, contractual customer policies and procedures that we are required to observe as to the assignment of employees to positions contemplated by the contract.
- Finally, if there are criminal convictions within the record that would not otherwise serve to automatically disqualify the applicant or employee, the decision maker may take into account only such convictions that can be clearly articulated as having a substantial relevance to the contemplated position and business need. Given that, at this point in the decision making process, further consideration of the criminal record is outside the scope of governmental or contractual requirements, any such further consideration of the criminal record bears a heavy burden if it is to affect the employment decision or employment action. No employment action of

any kind will be taken based on this third level of consideration without prior approval of the General Manager and a Human Resources professional assigned to the operation.

- It should be made clear to all parties in interest, including employees, applicants and supervisors, that the Company has no policy which serves as an across-the-board bar to employment based on criminal record.
- Driver applicants must complete a Certificate of Violations (or Abstract, in Ontario) regarding any convictions, whether criminal or motor vehicle, so that they can be verified.

Driver Qualification Files

Policy

STA/STC must ensure that all drivers are properly qualified to operate Company vehicles. Records of all driver qualifications must be kept in each driver's file.

Responsibility

The Terminal/Branch Manager is ultimately responsible for driver credential compliance. File maintenance and data entry may be delegated to the Safety Supervisor, or other management personnel as determined by the Terminal/Branch Manager.

The Easy Driver file management program is provided to ensure that all driver credentials are kept current. All date-related data must be updated on a timely basis in order for this program to be effective. STA/STC compliance reports will be generated on the first working day of each month. General Managers will be responsible for verifying that any driver with expired credentials is, in fact, not on the road.

Procedures

The following items must be kept on file for each driver:

DOT/MTO:

- Driver application
- Copy of current license
- Current Motor Vehicle Report (MVR)
- Driver Certificate of Violations (if required)
- Any certificates and/or endorsements needed to be a qualified driver
- Copy of the driver's road test and/or credentials
- Certificates and/or records of training
- Request from previous employer, including drug and alcohol test results
- Medical certificates (including any waivers)
- Entry level training certificate

Medical File:

- Health insurance
- Medical notes

- FMLA

HR Forms:

- Signed acknowledgement forms
- I-9 (U.S.); TD1 (Ontario)

All other items will be within the driver's qualification file, as warranted.

Driver qualification files will be kept for the duration of the driver's employment, in addition to the time frame required thereafter by Canadian MTO, USDOT and corresponding state or provincial authorities. Records will be kept at STA/STC's principal place of business, or at a regional location.

Periodic Review of Driver Qualification Files

At least once per year, all driver qualification files will be reviewed for completeness and accuracy. (See Appendix for Application and other necessary forms.)

Monitor/Attendant Pre-Qualifications

Monitor/Attendant Proficiency

All monitor/attendant applicants must be at least eighteen (18) years of age. U.S. applicants must submit to a pre-employment, non-DOT drug screen and pass with negative test results. All STA/STC applicants must show proficiency in the following areas prior to employment:

- Ability to walk up the steps of all school vehicles in the fleet, without assistance
- Ability to reach and safely operate all factory-installed roof exits, side window exits and side/rear emergency doors
- Ability to open the rear emergency door, sit down on the floor and push themselves out of the door, landing safely on their feet

As a condition of continued employment, all monitors/attendants must be able to:

- Retrieve and correctly use all factory-installed emergency equipment
- Assist passengers with seat belts, and with exiting the vehicle from any emergency exit
- If required, correctly operate the wheelchair lift and correctly secure all wheelchair securement devices on all vehicles in the fleet
- Always check for passengers remaining on board at the completion of each route prior to exiting the vehicle; leaving a passenger unattended will result in termination

Special Needs

As per assigned route, the monitor/attendant will be responsible for making sure that such special equipment as needed is in proper working order. Monitors/attendants will keep accurate attendance of students when so mandated.

Wheelchair Vehicles

The monitor/attendant and driver will be responsible for knowing the full operation procedures of the wheelchair lift, and complete installment procedures for the tie-down straps and/or hooks, in accordance with the manufacturer guidelines.

After each run, the driver will be responsible for ensuring that all special equipment is secure, such as car seats, wheelchair straps, safety vests and seat belts, thereby eliminating any equipment moving around inside the vehicle.

It will also be the monitor/attendant and driver's responsibility to ensure that all regular seat belts in the passenger area are present on the seat and in good working condition. The seat belt ends are not to hang in the aisle or on the floor.

Driver Training Program/Pre-Service Instruction

Every new driver trainee interested in acquiring a CDL (or a Class B or Class E license, in Ontario) shall successfully complete a minimum prescribed 35-hour new Driver Training Course ("DTC") consisting of 20 hours of Classroom instruction and 15 hours of Behind-the-Wheel instruction in operating a school bus. Driver training programs/pre-service instruction shall meet or exceed minimum government requirements.

Classroom Instruction

Classroom instruction shall include, but not be limited to, the following topics covered in the DTC training material set of fifteen DVDs:

- Meet the Bus, Pre/Post-Trip Inspections, Mirror Adjustments and Reference Points
- Check Your Brakes, Safety Basics, LLLC Defensive Driving, Intersections
- Safe Backing, Railroad Crossings, Danger Zones
- Safe Bus Stops, Preparing Students to Learn, Student Management
- Emergency Evacuations, Post-Accident Procedures

Practical Skills/Training (classroom-type training as demonstrated on the vehicle):

- Mirror Adjustments and Reference Points, Brakes, Backing
- Emergency Evacuations
- Observation on a Live Run with Passengers
- Proper procedure to perform thorough inspection of the vehicle for remaining passengers prior to exit

Other Classroom training topics include:

- Lock Out/Tag Out, Right to Know, Blood Borne Pathogens
- Hours of Service
- Anti-Idling

- STU Modules, as selected by the Manager
- Public Relations
- Adverse Weather Conditions and Road Hazards
- In the U.S., familiarize each driver trainee with the federal controlled substances, alcohol use and testing regulations contained within Section 382.91 and the STA/STC policies and procedures, with respect to meeting these federal requirements

Behind-the-Wheel Instruction

Behind-the-wheel instruction shall be conducted in all types of vehicles that the driver trainee may be assigned to drive and shall include, as a minimum:

- Pre/Post-Trip Inspections, Left/Right Turns, Loading/Unloading Procedures
- Defensive Driving/LLLC, Backing, Backing in the Yard, Railroad Crossings
- Merging/Lane Changing, Hill Start/Downgrades, Intersections, Adverse Weather Conditions
- Special Needs
- Proper procedure to perform thorough inspection of the vehicle for remaining passengers prior to exit
- Other state/provincial requirements

Please Note: Any driver applicant with current school bus credentials who has not been employed as a school bus driver in excess of 365 days must undergo STA/STC's entire new Driver Training Course, as listed in the DRIVER TRAINING PROGRAM/PRE-SERVICE INSTRUCTION – Classroom instruction and Behind-the-Wheel sections on the previous pages. It should be understood that an applicant with prior school vehicle driving experience may not need the full 35 hours of training required of a new trainee without prior experience, but is still required to complete the entire course as outlined above. The trainer(s) must document that this applicant has demonstrated that they have mastered the knowledge and skills contained in the 15 DVDs included with the DTC set.

Training and Evaluation of Experienced Applicants

STA/STC requires all pre-licensed and certified driver applicants to successfully complete a road test examination conducted by a Company-designated evaluator prior to any offer for employment. U.S. applicants holding a current CDL and appropriate school bus endorsements, and Ontario applicants with a Class B or Class E license, will be required to complete a minimum of ten (10) hours of training (six (6) hours of Classroom and four (4) hours of Behind-the-Wheel), to be conducted as such:

- Minimum four (4) hours Classroom instruction, prior to transporting any passengers.
- Minimum additional two (2) hours Classroom instruction within six (6) months of the hire date.
- Minimum two (2) hours Behind-the-Wheel instruction, prior to transporting any passengers.
- Minimum two (2) hours of additional Behind-the-Wheel instruction within six (6) months of the date of hire, to be completed on the driver's assigned route, or suitable equivalent as determined by the Manager, a portion of which shall include passengers.

These two (2) hours of post-hire training may be considered as that driver's biennial evaluation. Any driver applicant with prior STA/STC experience, or a current driver returning to active status following

an approved leave of absence when that separation is less than six (6) months, must demonstrate their ability to pass a Behind-the-Wheel evaluation of no less than one (1) hour, as a minimum.

Instruction shall be provided by certified instructors or Company designees using approved materials, techniques, informational DVDs and manuals. The road test examination shall be performed in the type of vehicle the driver will operate for the Company. The Company's road test examination will cover the following areas:

- Understanding the driver's area, controls and gauges
- Pre-trip and post-trip inspection procedures and requirements
- Smooth starting and stopping (pedal application)
- Turning techniques and tail swing observation
- Proper use of signals, hazard lights and school bus lights
- Proper adjustment and use of mirrors
- Proper use of clutch and gearshift, or automatic transmission
- Proper procedures for railroad crossings
- Proper procedures for loading and unloading students
- Proper procedures for wheelchair securement and other equipment, if required
- Proper backing procedure and techniques
- Knowledge in Defensive Driving techniques, as outlined in the evaluation form
- Proper procedure to check for students on the bus at the completion of each route

In-Service Training

STA/STC is committed to the continual safety awareness and preparedness of our drivers. Any driver demonstrating unsafe behaviors resulting in preventable accidents and/or moving traffic violations will not be tolerated. Any driver with more than two (2) preventable accidents within a three (3) year period will be terminated. Any driver convicted of more than two (2) moving violations within a three (3) year period will be terminated.

Each driver will be required to participate in ten (10) hours of in-service training within a school year. Newly hired drivers recently completing the 35-hour Driver Training Course, and new drivers hired with a current and valid CDL, will be required to complete the 10-hour in-service training course on a prorated basis, based on the date of hire. In-service training will be a combination of branch pre-season start-up meetings, safety meetings, bi-annual (every two years) driver evaluations, and local, state or provincial-required programs. Documentation of this in-service training is required.

In-service training may include, but not be limited to, the following:

- Review and further discussion of all pre-service topics
- Government or Company-approved Defensive Driving Course
- First-Aid procedures
- Blood borne pathogens
- Special driving conditions specific to the area and region
- Field trip and activity trip procedures
- Vehicle handling procedures in all weather and road conditions

- Use of emergency equipment, as required
- Harassment policy, including District and Company policies
- Transportation procedures for Special Needs passengers
- Railroad grade crossing procedures
- Loading and unloading procedures for passengers
- Student management and violence prevention/bullying awareness
- Fuel-efficient driving practices
- Anti-Idling policy
- Public and community relations
- Health issues and stress management
- Proper procedure to check for students on the bus at the completion of each route

Rider/Passenger Policy

Policy

It is the policy of STA/STC that no authorized riders or passengers are allowed onboard Company vehicles.

Responsibility

It is the responsibility of every driver to ensure that no unauthorized passenger or rider is allowed onboard a Company vehicle.

It is the responsibility of local management to review this policy with each driver during orientation and to perform ongoing monitoring and documentation in reference to the Rider/Passenger Policy.

Use of Electronic Equipment While Driving

Two-Way Radio Use

If a school bus/vehicle is equipped with a two-way radio, its purpose is to provide a communication link among all transportation units for transmission of urgent messages and vital information. The transmission of messages not related to Company business is prohibited. The radio must be turned on at the beginning of the pre-trip bus inspection and turned off at the end of the driver's shift.

During an accident, the radio **MUST BE CLEARED FOR EMERGENCY USE ONLY**. During this time, no transmissions are to be made except in the case of another emergency until the dispatcher has given an all clear on the radio (see Accident Procedures for further detail).

AM/FM Radio Use

AM/FM radios are not to be installed in buses by employees. Radios are to be installed at the factory or by a Company mechanic. External music devices such as portable stereos, MP3 players, PDA's and the use of headphones/ear buds ARE NOT PERMITTED. School districts/school boards reserve the right to approve radio use, radio stations and/or volume. Music from students should not be accepted for use on Company vehicles, unless required and documented by a student's IEP.

Cellular/Satellite Telephone Use

STA/STC drivers, monitors/attendants and mechanics WILL NOT receive or make phone calls or text messages while on duty and providing a safety-sensitive function, including but not limited to:

- While conducting pre-trip/post-trip inspections and/or brake tests
- Driving a school bus, whether inside or out of the yard
- During the process of loading or unloading passengers, or while behind the wheel
- While fueling the bus
- While inspecting the vehicle for passengers prior to exiting

While performing any safety-sensitive functions, it is prohibited for drivers, monitors/attendants or mechanics to wear and/or use any hands-free wireless telephone device, including but not limited to Bluetooth devices or any other headsets.

In the event of an emergency and if the two-way radio in the vehicle is not working, the use of a cell phone is permitted after the driver performs the following procedure: Locate the closest safe location, pull over and secure the vehicle. Once these measures have been taken, a call to the office using a cell phone may be placed.

Vehicles equipped with cellular phones only are to be turned on anytime while in operation; however, the phone should only be used for emergency purposes and only once the vehicle has been parked in a safe location. The phone is for Company use ONLY. If personal calls are made, the driver is responsible for all charges, service fees and may be subject to disciplinary action.

Responsibility

It is the responsibility of the Safety Department to inform each employee of this policy during orientation.

It is the responsibility of all management and supervisory staff to ensure compliance with this policy by all employees at all times.

Procedures

The Safety Department will inform each employee at time of hire as to the requirements of STA/STC, pertaining to this policy. The Safety Department will note the time and date that this policy is reviewed with each employee within their retained employee file.

Any ticket received by a driver or mechanic for the illegal use of a cell phone or other electronic device will be that individual's responsibility and must be reported to STA/STC by the next business day (see Employee Policy Signature page).

Any employee found violating this cell phone use policy will be subject to disciplinary action up to and including termination.

U.S. DOT Drug and Alcohol Policy

Policy

STA/STC is dedicated to the health and safety of our employees. Drug and/or alcohol use may pose a serious threat to an employee's health and safety. Therefore, it is the policy of STA/STC to prevent drug use and alcohol abuse from having an adverse effect on our employees.

For U.S. drivers, the serious impact of drug use and alcohol abuse has been recognized by the federal government. The Federal Motor Carrier Safety Administration (FMCSA) has issued regulations which require the Company to implement an alcohol and controlled substances testing program.

The purpose of the FMCSA-issued regulations is to establish programs designed to help prevent accidents and injuries resulting from the misuse of alcohol or the use of controlled substances by drivers of commercial motor vehicles. STA/STC will comply with these regulations and is committed to maintaining a drug-free workplace.

It is the policy of STA/STC that the use, sale, purchase, transfer, possession or presence in one's system of any controlled substance (except medically prescribed drugs) by any employee while on the Company premises, engaged in Company business, operating Company equipment or while under the authority of STA/STC is strictly prohibited. Disciplinary action will result in termination.

Neither this policy nor any of its terms are intended to create a contract of employment or contain the terms of any contract of employment. The Company retains the sole right to change, amend or modify any term or provision of this policy without notice.

Responsibility

In accordance with 49 CFR §382.601(a), each employer in the U.S. shall provide educational materials that explain the requirements in Part 382 and the employer's policies and procedures with respect to meeting these requirements. The employer shall ensure that a copy of these materials is distributed to each driver prior to the start of alcohol and controlled substances testing under this part, and to each driver subsequently hired or transferred into a safety-sensitive function position (i.e., operating a commercial motor vehicle as defined in §382.107 requiring a CDL).

Each employee who performs a safety-sensitive function is responsible for reviewing the content of the information presented to drivers. Each driver is responsible for asking questions about the procedures if the content is unclear to him/her. Drivers may pose follow-up questions about the content of this policy and its procedures to the Safety Department or to their immediate supervisor.

U.S. Drug and Alcohol Procedures

Regulatory Requirements

All drivers who operate commercial motor vehicles that require a commercial driver's license under 49 CFR Part 383 are subject to the FMCSA's drug and alcohol regulations, 49 CFR Part 382.

Non-Regulatory Requirements

The Federal Motor Carrier Safety Administration Regulations (FMCSA) set the minimum requirements for testing. The Company's policy in certain instances may be more stringent. This policy will clearly define what is mandated by the FMCSA and what is Company procedure.

Employer Responsibility

It is the Company's responsibility to provide testing for the driver that is in compliance with all federal and state laws and regulations, and that is within the provisions of this policy. The Company will retain all records related to testing and the testing process in a secure and confidential manner.

All supervisors must make every effort to be aware of a driver's condition at all times when the driver is in service for the Company. The supervisor must be trained and certified to make reasonable suspicion observations to determine if the driver is impaired in some way and must be prepared to implement the requirements of this policy, if necessary.

Please Note: Per FMCSA regulation (Sec. 382.505), a driver found to have an alcohol concentration of 0.02 or greater but less than 0.04 shall not perform, nor be permitted to perform, safety-sensitive functions until the start of the driver's next regularly scheduled duty period, but not less than 24 hours following administration of the test.

Circumstances for Drug Testing

Pre-employment Sec382.301

In accordance with §382.301, all driver applicants will be required to submit to and pass a urine drug test as a condition of employment.

STA must contact the previous employer's testing program prior to employing the driver, and must obtain the following information:

- Name and address of the program (usually the driver's prior and/or current employer)
- Verification that the driver participates or participated in the program
- Verification that the program conforms with the required procedures set forth in 49 CFR Part 40

- Verification that the driver is qualified under this rule, including that the driver has not refused to submit to an alcohol or drug test
- The date the driver was last tested for alcohol or drugs
- The results of any drug or alcohol test administered within the previous six (6) months, and any violations of the alcohol abuse or drug use rules

A driver applicant who has been shown to have refused a drug or alcohol test, failed a random, reasonable suspicion, post-accident, return-to-duty, follow-up alcohol test, or tested positive for controlled substances, will not be considered for employment.

A driver applicant who has tested positive for drugs during a DOT pre-employment test will not be considered for employment.

Reasonable Suspicion Testing (Sec. 382.307)

If the supervisor or other Company official designated to supervise employees in a safety-sensitive function believes that an employee is under the influence of alcohol or controlled substances, the employee will be required to undergo a drug and/or alcohol test. Any employee believed to be under the influence of alcohol or controlled substances must be escorted to the testing facility and not permitted to drive themselves. In the event of a positive result to the drug or alcohol test, the employee is not permitted to drive themselves in their own personal vehicle. The Company will assist the employee by attempting to contact someone identified by the employee to arrange for transportation home. In the event a contact cannot be made, the Company will make arrangements to transport the employee to his/her home by cab or other suitable means.

The basis for this decision will be specific, contemporaneous, regarding observations concerning the appearance, behavior, speech or body odors of the driver.

Per FMCSA regulation, if the driver tests 0.02 or greater but less than 0.04 for alcohol, the driver will be removed from all safety-sensitive functions, including driving a commercial motor vehicle, until the start of the driver's next regularly scheduled duty period, but not less than 24 hours following administration of the test.

A written record of the observations leading to an alcohol or controlled substance reasonable suspicion test, signed by the supervisor or Company official who made the observation, must be completed within 24 hours of the observed behavior or before the results of the alcohol or controlled substances test are released, whichever occurs first.

Post-Accident Testing (Sec. 382.303)

Drivers are to immediately notify their supervisor when they are involved in an accident. According to FMCSA regulations (Sec. 382.303), post-accident drug and alcohol testing is required if the following conditions exist:

- A fatality occurs
- STA's driver was issued a citation as a result of the accident within eight (8) hours for a drug and alcohol test or thirty-two (32) hours for a drug test only, and either one or both of the

following has occurred: A) Removal of anyone away from the scene for medical treatment; B) Any vehicle towed away from the scene

A driver must be tested for alcohol within eight (8) hours and tested for drugs within thirty-two (32) hours of the accident. The driver must remain readily available for testing. If the driver is not readily available for alcohol and drug testing, he/she may be deemed as refusing to submit to testing. A driver involved in an accident may not consume alcohol for eight (8) hours or until testing is completed.

Random Testing (Sec. 382.305)

STA will conduct random testing for all drivers as follows:

- STA will use a company-wide selection process based on a scientifically valid method, prescribed by FMCSA regulations
- STA will utilize a consortium that will use a selection process based on a scientifically valid method, prescribed by FMCSA regulations

According to Sec. 382.211, a driver may not refuse to submit to a post-accident, random, reasonable suspicion or follow-up alcohol or controlled substance test as required by the regulations. A driver who refuses to submit to such tests may not perform or continue to perform safety-sensitive functions and must be evaluated by a substance abuse professional as if the driver tested positive for drugs or failed an alcohol test.

Refusal to submit includes failing to provide an adequate breath or urine sample for alcohol or drug testing, and any conduct that obstructs the testing process. This includes alteration or substitution of a urine sample by any employee.

Special STA Provision

Any employee taking a post-accident, random or reasonable suspicion alcohol test with a reading of 0.02 or greater, or who has a positive result on a controlled substance test, will be immediately discharged from employment. We are a zero tolerance company.

Any employee who refuses to take a breath alcohol test or a drug test will receive Substance Abuse Program (SAP) information followed by termination.

Employees who are not scheduled for testing who volunteer that they have an alcohol or controlled substance problem may be allowed to enter a rehabilitation program and return to work. The rehabilitation program and follow-up testing must be approved by STA. Employees will be on unpaid leave of absence while rehabilitation and follow-up testing is taking place. The employee must pay all costs of rehabilitation and testing. (Employee Policy Signature Page is required and can be found in the Appendix.)

Hours of Service – Passenger-Carrying Vehicles

Policy

STA/STC is committed to strictly following the hours-of-service regulations for passenger-carrying vehicles. Regulations require all motor carriers and drivers to follow the hours-of-service requirements. The issue of driver fatigue is of concern for all commercial drivers, including school bus drivers. This issue needs particular attention as it relates to morning routes. We recognize that any work performed after midnight is likely to interfere with a driver's ability to report for a morning route alert, rested and fit for duty.

Therefore, it is STA/STC's policy that no driver may drive a morning route if he/she has performed any work after midnight on the night before the morning route. This includes both STA/STC work and non-STA/STC work. A driver may not hold outside employment that regularly includes hours after midnight. If, for any reason, a driver does perform work after midnight and is scheduled for a morning route, then he/she must advise their immediate supervisor as soon as possible so that a replacement driver may be assigned to the route. A driver with early morning outside employment beginning not more than two (2) hours prior to their assigned AM report time will not be deemed ineligible by STA/STC, provided they have had sufficient rest and are in compliance with all federal, state and provincial regulations.

Responsibility

It is the responsibility of the Branch Manager to implement the hours-of-service policy, and to ensure that all employees are aware of and understand it. It is also the responsibility of the Branch Manager to be aware of their drivers' outside employment, including normal hours worked outside of the branch. The Branch Manager is required to emphasize to drivers on a regular basis the importance of arriving at work rested and fit for duty for any route, the importance of getting adequate sleep (here defined as a minimum of 5 to 7 hours per day) and rest, and the requirement that drivers make their supervisor aware of outside hours worked that may conflict with the policy.

Drivers are expected to know and apply the passenger-carrying vehicle hours-of-service rules. They should familiarize themselves with company-specific policies that are in addition to these rules. Any disregard for these hours-of-service rules and/or company-issued policies will result in disciplinary actions by the Company.

Drivers are expected to monitor their on-duty/off-duty time and to know their availability. They have a certain level of responsibility for safety compliance, in addition to those who dispatch them and to those who audit the logs. Logs must be organized and maintained in the facility for a period of six (6) months from the trip date, at which time they must be disposed of properly.

A driver is expected to approach their supervisor if he/she has questions about the hours-of-service rules and/or the company-issued policies. Any hours-of-service violations resulting from a misunderstanding of the rules may result in a refresher retraining.

Drivers are expected to use their best judgment if feeling ill or fatigued. Even if they have available hours under the rules, they must not begin or continue with a shift when feeling ill or fatigued. Occurrences will be reviewed by the local safety professional. Abuse of this policy will follow the employee disciplinary policy.

Safety and operations personnel must not allow a driver to violate the hours-of-service rules and/or company-issued policies. Supervisory personnel must not allow a driver to operate a commercial motor vehicle if he/she is ill or fatigued, despite having available hours under the rules.

Hours of Service - U.S. DOT Procedures

10-hour Driving Rule

A driver cannot drive for more than ten (10) hours following eight (8) consecutive hours off duty. All time spent at the driving controls of a commercial motor vehicle is considered driving time.

15-hour On-Duty Rule

A driver cannot drive after having been on duty for a total of fifteen (15) hours, no more than ten (10) of which can be driving. After fifteen (15) hours on duty, a driver cannot drive again until he/she has eight (8) consecutive hours of rest. The total number of on-duty hours may vary depending on the regulations under which a specific Branch Manager chooses to operate.

On-Duty Time

When a driver begins to work, or is required to be in readiness to work until he/she is relieved from work, is considered on-duty time. Work for any entity, regardless of whether the employer is a carrier, is considered on-duty time. Operations management will be responsible for collecting all information pertaining to their drivers' hours spent at outside employment. Forms are provided to the driver to notify their supervisor of additional on-duty time. On-duty time includes the following:

- All time at a plant, terminal, facility or other property of a motor carrier or shipper, or on any public property, waiting to be dispatched, unless the driver has been relieved from duty by the motor carrier
- All time inspecting, servicing or conditioning any commercial motor vehicle at any time
- All driving time
- All time, other than driving time, in or upon any commercial motor vehicle except time spent resting in a sleeper berth
- All time loading or unloading a commercial motor vehicle, supervising or assisting in the loading or unloading, attending a commercial motor vehicle being loaded or unloaded, remaining in readiness to operate a commercial motor vehicle or in giving or receiving receipts for shipments loaded or unloaded
- All time repairing, obtaining assistance or remaining in attendance upon a disabled commercial motor vehicle
- All time spent providing a breath sample or urine specimen, including travel time to and from the collection site, in order to comply with alcohol and drug testing requirements
- Performing any other work in the capacity, employ or service of a motor carrier
- Performing any compensated work for a person who is not a motor carrier

Meal Stop Exception

A driver may record meal stops as off-duty time if all four of the following criteria are met:

- STA relieves the driver of all duty and responsibility for the care and custody of the vehicle, its accessories and any cargo or passengers it may be carrying
- The duration of the driver's relief from duty must be a finite period of time which is of sufficient duration to ensure that the accumulated fatigue resulting from the operation of a commercial motor vehicle will be significantly reduced
- The duration of relief from duty must have been made known to the driver, via written instructions, prior to his/her departure
- For the duration of the stop, the driver must be at liberty to pursue activities of his/her own choosing and to leave the premises where the vehicle is situated

100 Air-mile Radius

A driver is not required to complete a log if all of the following criteria are met:

- The driver operates within a 100 air-mile radius of the normal work reporting location
- The driver, except a driver salesperson, returns to his/her work reporting location and is released from work within twelve (12) consecutive hours
- At least eight (8) consecutive hours off-duty separates each twelve (12) hours on-duty
- The driver does not drive more than ten (10) hours following eight (8) hours off-duty

STA must maintain the driver's time records for six (6) months, showing the time the driver reports for duty each day, the time the driver is released from duty each day, the total number of hours the driver is on-duty each day and the total time for the preceding seven (7) days for drivers who are used the first time or intermittently.

One hundred (100) air-miles are equivalent to 115.08 statute miles.

Fatigued Drivers

Drivers are prohibited from operating a commercial motor vehicle if they are ill or fatigued, even if they have available hours under the hours-of-service rules. In a case of grave emergency where the hazard to occupants of the commercial motor vehicle or other users of the highway would be increased by compliance with this section, the driver may continue to operate the commercial motor vehicle to the nearest place at which that hazard is removed. This is in accordance with 49 CFR §392.3.

Adverse Driving Conditions

A driver who encounters adverse driving conditions and, because of those conditions, cannot safely complete his/her run within the 10-hour maximum driving time, may drive for an additional two (2) hours to complete the run.

Adverse driving conditions include snow, sleet, fog or unusual road and traffic conditions which were not apparent to the person dispatching the run at the time it started.

A driver may not drive:

- For more than twelve (12) hours following eight (8) consecutive hours off-duty
- After fifteen (15) hours of on-duty time following eight (8) consecutive hours off-duty

Hours of Service - Canadian MTO Procedures

For each and every 24-hour “day”:

- Maximum thirteen (13) hours driving
- Maximum fourteen (14) hours on-duty (combined driving time and on-duty time – NOT DRIVING TIME)
- Minimum ten (10) hours off-duty (breaks shorter than 30 minutes do not count towards the required 10 hours)
- Mandatory 24 hours off-duty in fifteen (15) days, regardless of the on-duty time
- No driving after sixteen (16) hours of elapsed time

The typical school bus driver will not exceed thirteen (13) hours of driving and fourteen (14) hours of on-duty time in one “day”. However, if the school bus driver is doing charter work or is working for a second employer that is also a carrier (CVOR holder), the daily limits may come into play.

Definitions

“**On-duty**” includes time spent:

- Inspecting or servicing the bus
- Loading and unloading at designated locations
- Fueling
- In-class training
- Traveling in a bus as a co-driver (unless in a sleeper berth)
- Traveling as a passenger in a bus to a point where the driver will begin driving, unless he/she takes eight (8) hours off-duty upon reaching that point prior to driving, in which case it is considered “off-duty”
- Perform any work for any other carrier (CVOR holder)

“**Off-duty**” time includes:

- Any time other than “on-duty” time. Regulators interpret a driver to be “off-duty” if the driver is, during a stop, able to pursue activities of his/her own choosing and is able to leave the premises where the vehicle is parked.

“**Day**”:

- A 24-hour period of time decided by the operator that remains the same throughout the driver’s weekly or bi-weekly cycle. It is important that while the “day” is fixed for the entire weekly or bi-weekly cycle, it does not mean the driver cannot change his/her start time each day.

“Core rest”:

- The mandatory eight (8) hours of consecutive, off-duty time that must be taken before starting a new work shift. This core rest period resets the driver’s shift, allowing them to start a fresh work shift “window”.

160 Kilometer Radius

A driver is not required to complete a log if all of the following criteria are met:

- The driver operates within a 160-kilometer radius of the normal home terminal
- The driver returns to his/her home terminal and is released from work for at least eight (8) consecutive hours
- At least eight (8) consecutive hours off-duty separate each 24 hours on-duty
- The driver does not drive more than thirteen (13) hours following ten (10) hours off-duty

STC must maintain the driver’s time records for six (6) months, showing the time the driver reports for duty each day, the time the driver is released from duty each day, the total number of hours the driver is on duty each day and the total time for the preceding seven (7) days for drivers who are used for the first time or intermittently.

Pre/Post-Trip Inspections

Policy

STA/STC is committed to following a thorough daily pre-trip and post-trip inspection program. Regulations require commercial motor vehicles to be inspected before and after they are operated.

Our daily inspection procedures will help ensure safety, prevent breakdowns and provide a sound basis for a good preventive maintenance program.

Responsibility

All drivers, mechanics and supervisors must know and apply the driver vehicle inspection procedures. Any disregard for inspection procedures may result in disciplinary action. Drivers must only operate commercial vehicles that have been inspected and deemed safe. No one shall encourage or coerce drivers to violate these safety standards.

Procedures

Each driver must be diligent that equipment is in proper working condition prior to operating a vehicle.

Drivers must use the forms provided to record the daily inspection and report defects of the vehicles. Defects are reported in writing to the Maintenance Department. The repair is made and recorded

according to facility schedules and government regulations. The Branch Manager must be made aware of maintenance schedules, defect reports and repair processes.

Driver Pre-Trip Inspection Report

Each driver is required to complete a daily written report, signed and dated, for each vehicle's condition. The forms will be kept on file at the facility according to the local, state or provincial requirements (see Appendix for example forms).

STA/STC will use an inspection report form that may have an original and multiple copies for retention purposes.

Drivers must fill out the applicable fields on the pre-trip inspection report at the time of inspection. The regulations require any minor or major defects to be noted on the pre-trip inspection report.

The driver must also note any other defects that would affect the safe operation of the vehicle or result in its mechanical breakdown. Drivers must use the following guidelines when reporting defects:

- **No defects:** When no safety-related problems are reported by the driver, the driver keeps the pre-trip inspection report in the vehicle and later submits the pre-trip inspection report unless otherwise required by government mandate.
- **Minor/major defects:** When a driver reports minor/major defects, he/she must immediately notify the Maintenance Department and must refrain from operating the vehicle depending on state or provincial law. All defects that impact safe operation must be repaired before the vehicle can be operated. The mechanic completing the repair must sign the inspection book, which remains inside the vehicle, indicating to the driver that the repair has been made.

The original copy of the inspection report and the certification of repairs must be retained in each vehicle's maintenance file for the lifetime of the vehicle, and for three (3) years after disposal of said vehicle.

The original copies of the inspection reports on which no defects were noted must be retained for a minimum of six (6) months in the U.S., and a minimum of two (2) years in Canada.

Driver On-the-Road Inspections

Drivers are required to monitor the condition of the vehicle during operation. If minor defects are found during the course of the vehicle's operation, drivers must record the minor defects on the pre-trip inspection report and notify their supervisor and/or dispatch. If major defects are found during the course of the vehicle's operation, drivers must safely stop the vehicle and immediately contact the supervisor and/or dispatch for further guidance.

Bus/Van Breakdown Procedures

Each bus/van is to carry an emergency card which lists telephone numbers to be used to summon help in case of an emergency, and should be equipped with outside communication devices (i.e., radios, cell phones, etc.). Under no circumstances should the driver leave the bus and its passengers; his/her responsibility is to remain with the passengers and protect them from injury.

Recommended procedures to be used following a breakdown are as follows:

- Ask the driver whether the students are safe on the vehicle, or whether they should be evacuated. If evacuation is necessary, have the driver supervise the unloading and give direction to maintain safety.
- Have the driver activate the 4-way hazard lights, set the parking brake and remove the keys from the ignition.
- Have the driver set out all three (3) reflectors, per DOT/MTO regulations.
- Ensure that the spare replacement vehicles have been fully fueled, are operational and are of adequate passenger capacity.

In the event of a breakdown, the supervisor should contact the school district/school board designee and assist in contacting schools, parents, etc., with an estimated time of arrival.

General Safety Communication

“Heads Up” Procedure

There are times throughout the year when a local event may occur, requiring the quick and accurate communication of facts. As an example, the occurrence may be in the form of an accident or injury of a serious nature, or an event causing media attention. To address this concern, the Heads Up procedure was created.

If you are faced with an event similar to those described above, any member of the local management team is authorized to send a brief description of the concern to the STA/STC Leadership Team by e-mailing: headsup@ridesta.com. By doing so, managers will immediately reach the support professionals who may be needed to assist or guide them through the next steps.

“Safety Alert” Procedure

The Safety Alert procedure is designed to take advantage of our size by identifying and communicating safety-related issues and events quickly and clearly amongst our locations. The Safety Alert will provide information on events that have taken place within STA/STC, throughout the industry, and may also include general information or messages that impact a large majority of our locations. A risk identified in a local terminal is likely to exist in others; sharing this information with our drivers, monitors/attendants and mechanics is crucial to our goal of reducing risks that negatively affect safe operations.

The Safety Alert program will have three components:

- When you have identified a safety-related topic that you think may benefit others, you will be asked to communicate that information to the Safety Alert Committee by e-mailing a description of the happening or lesson learned to: safetyalert@ridesta.com.
- The Safety Alert Committee will evaluate the information received and will prepare a written description and course of action to be taken, and will communicate this to the local management teams.
- The Safety Alert Compliance Form should be completed by the Branch Manager, indicating the date and method of communication used. Each Safety Alert Compliance Form must be stored in a separate folder.

Accident/Injury Investigation and Reporting

Policy

The Branch Manager, in consultation with the Safety Manager, will keep the accident register and injury file, and will monitor the necessary corrective actions to be taken after an accident resulting in injuries has occurred.

It is STA/STC's policy to fully investigate any accident or injury involving Company personnel and vehicles.

STA/STC's policy is that drivers who leave the scene of an accident (without permission) will be subject to disciplinary action, up to and including termination. STA/STC believes strongly that the accident/injury investigation begins at the scene; therefore, certain driver responsibilities must be carried out at the scene of an accident.

Responsibility

All managers/supervisors must be familiar with this policy in order to train drivers and walk them through the steps in the event of an accident. Drivers are expected to know and apply all Company accident investigation procedures as details of the incident are documented and evaluated.

Procedures

Motor Vehicle Accident Reporting at the Scene: Depending on the severity of the accident, employees of STA/STC will be expected to follow proper procedures, including the following:

- Remind the driver to:
 - Keep passengers safe; evacuate if necessary and triage any injuries
 - Move vehicle off the roadway, if vehicle is a safety hazard
 - Place warning devices around vehicle
 - Chock wheels (if required)
 - Complete the accident document packet

- Possess the passenger manifest and seat location
- Management/Supervisory Responsibilities:
 - Notify the authorities, as determined by your facility
 - Notify the school district/school board
 - Dispatch appropriate personnel to the scene: Keep the driver calm; document damage to the vehicle(s) and property with a camera; verify that accident document packet was completed properly
 - Ensure that the driver submits all documentation immediately, as required by this policy and regional regulations

In the Event of a Severe Accident

A Company representative shall report to the scene. It may be necessary for a Company supervisor to accompany any injured employee(s) to receive medical treatment; this supervisor should remain until all parties have been attended to.

Remember, [insert approved statement to the press]. Report all updates to upper management who can assist in supporting customer and employee relations.

The Heads Up program should be used by local management to communicate accident/incident information of a serious nature, or events that may result in media attention, to upper management by sending an e-mail to: headsup@ridesta.com as soon as any information is learned.

“Accident kits” should be readily available at all locations, containing all items necessary for collecting information at the scene including drug test forms, passenger lists, a camera, insurance card, clip board, pen/pencil, etc. The insurance carrier should be notified as soon as possible.

Accident/Injury Investigation and Review

The local management must interview the driver involved in the accident as soon as possible. An initial assessment of whether the accident was preventable or non-preventable should be made at that time. All drivers involved in a preventable collision must be retrained in the applicable area(s) by an approved trainer prior to that driver operating a Company vehicle. A minimum of one (1) hour of Behind-the-Wheel retraining based on the cause and recreation of the collision must be completed and documented by the instructing trainer. Once a satisfactory evaluation has been noted, the driver may return to operating a Company vehicle. A complete investigation will follow with more detail, including but not limited to the following:

- Road conditions
- Weather conditions
- Hours of service and last time of the driver’s rest/sleep
- Description of the route and whether the driver has been on the route in the past
- Speed at which the driver was traveling

After an initial contact with the driver of the vehicle involved in the accident, the Branch Manager, and based on severity, upper management will determine the level of official involvement that needs to

happen in the specific instance, including crisis management and the inclusion of the STA/STC public relations consultants.

After the accident evaluation is completed, the appropriate Accident Injury Review Board (U.S.) or the Health and Safety Committee (Ontario) will create a report of recommendations on how to prevent accidents of the same nature in the future. The local safety professional or Branch Manager is responsible for keeping records of all accidents involving STA/STC vehicles and drivers. These accident records must be kept in a separate file and retained indefinitely.

All accidents are to be listed in an Accident Register by chronological order, and kept within each location. In the U.S., a second USDOT register must be created for DOT Recordable Accidents only. DOT recordable accidents are those accidents in which one of the following conditions were present:

- A fatality
- A tow away of any vehicle from the scene
- An accident requiring medical treatment away from the scene

Safety Committee

Goal

A facility Safety Committee is essential to establishing a safe, healthy workplace and creating a safety culture while establishing norms within each location. A Safety Committee will be established in each STA/STC operating location. The object/goal of the committee is to help create a safe working environment, help eliminate workplace injuries, accidents and illnesses involving employees, as well as identifying hazards and how to prevent them. The Committee should take an active role in fostering STA's behavior-base approach to safety. The composition and procedures of the Committee should be formally adopted yearly, and distributed in writing. In the event of a major loss or accident of a serious nature, the corporate functional support teams will be available for assistance.

Purpose

The Committee's main purpose is to bring location employees together to achieve and maintain a safe workplace. They will review accidents and injuries, conduct workplace inspections, and help prevent and reduce the risk of future incidents. A Review of all preventable accidents should take place, to assess the results of the investigations determination. It will either concur or disagree with the investigator's conclusions, and will achieve its own conclusions based on the operation's established preventability criteria, and put it into writing. Because the criteria should have already been adopted in writing by the operation, the Committee's function will be most critical when "judgment calls" about accidents occur, as they surely will from time to time.

They will review all work place injuries, and make suggestions based on the investigation, on how to eliminate future risk. The Committee will review the Work Place Inspections that they have conducted, as well as recommendations from the staff, and make changes and recommendation to reduce future risk. The root cause of all preventable accidents will be determined and presented to the total driving staff at the next scheduled general in-service safety meeting. The purpose is to educate each driver as to what could have been done to prevent this type of accident in the future.

Composition of the Safety Committee

Successful committees have been established with a variety of membership configurations, depending on the size of the location, but to develop consistency and credibility, the make-up of the Committee should be stable. All those considered for membership should have a safe working environment as their main objective. Typical Committee membership includes some or all of the following:

- Facility Manager
- Safety Coordinator or Lead Trainer
- Bus Driver Representative(s) and Monitors
- Shop Representative
- Dispatch / Office Representative

Safety Committee Procedures and Protocols

Initial Formation: When initially formed, the Committee should meet as often as necessary to clarify its role and to finalize the specific procedures that will be followed when the first accident/ injury occurs. A good place to begin is with a thorough discussion of the operation's adopted preventability guidelines. Reading each preventability criteria aloud and discussing its applicability, what it "really means", can help a Committee to clarify its perspective. All members should have a clear understanding of all safety committee functions, hazard identification, and procedures for investigating accidents and injuries. All Committee members will complete the SBS Safety Management Training Course.

Committee Chair: Management should appoint a Committee chair (usually the Safety/Trainer who is responsible for convening the entire Committee monthly, for assigning a recording secretary and for maintaining records of the Committee's deliberations.

Once Established: After the Committee is securely established, they should meet monthly. Log/minutes should be kept for each meeting that should include what was reviewed and discussed, as well as any and all recommendations made by the Committee. This should be made available to all employees.

Injury Cases: The committee should review the incident and make assessment if the injury was preventable, or what could be done to prevent the incident from happening again. Committee should make recommendations for actions to prevent future injuries. Names of those injured employees should be redacted from the cases that are being reviewed.

Injury Reduction Plan: The Committee should conduct a quarterly facility inspection to identify potential hazards in the workplace. They should document their inspection, using Safe Work Practices Checklist* (Appendix 1) and discuss it at the monthly meeting. Recommendations for improvements and repairs should be presented to management. At each meeting, the prior inspection should be reviewed and all improvements that have been made should be documented, as well as those not addressed. Additionally, a Safety Suggestion Board/Box should be established and those suggestions should be discussed at Monthly meetings.

Accidents: The lead investigator should give a report on the accident, summarizing what happened and his/her conclusions, including whether or not the accident should be considered preventable on the

bus driver's part, and why. Committee members should question the investigator and discuss the accident. Accident Investigation should be completed, including contacting Insurance Company for additional information, before being presented to the Committee.

Final Assessment: After the discussion, the Committee should proceed towards its final assessment of the accident(s). There may be occasions when the Committee feels it needs more information than what was provided by the investigator for instance, a Committee visit to the accident site, with or without the driver, may be helpful in difficult cases, as well as interviewing the driver.

Consensus and Voting: Through discussion, a successful Committee will almost always arrive at a consensus first, but eventually it should formally vote as to whether the accident was preventable or non-preventable on the driver's part. This vote should be recorded in the Committee's notes and the determination logged onto the Minutes/Log of the meeting. and forwarded to the individual responsible for maintaining the permanent accident file., with a copy given to the bus driver. No disciplinary action should be discussed at this committee. Any Disciplinary action will be taken by management only.

Reviewing Preventability Guidelines: As the Committee reviews accidents and attempts to apply the adopted preventability guidelines of the operation to them, useful suggestions for revising, "fine tuning", deleting or expanding the guidelines may arise. Such suggestions should be passed along, in writing, to management.

Preventability Guidelines

Determining preventability of an accident is an extremely important step in the process of building a safety culture. In general, an accident should be considered Preventable if our driver involved could have done anything differently to avoid the collision or incident from occurring. Deeming an accident as Preventable will have an impact on the driver's return to work required retraining or may result in that driver being terminated.

An accident deemed to be Non Preventable should not excuse the driver from driving defensively at all times. Defensive driving for a professional school bus driver can be defined as "one who drives to avoid accidents in spite of the incorrect actions of other people and adverse driving conditions" Adverse weather conditions should not be the criteria for deeming an accident as non preventable in and of itself. The professional driver is expected to manage those weather related risks.

Employment and Disciplinary Decisions

Because the Safety Committee is composed, by definition, of representatives of both management and non-management employees, the Committee can have no discussion or decision-making role related to any adverse employment or disciplinary action which the company may be entitled to take against any employee for any reason, including in connection with any injury, accident, or unsafe behavior or unsafe workplace condition that may come before the committee. Furthermore, the Committee may not establish, suggest, propose or discuss any system of progressive discipline or penalties that would be applicable to any Company employee for any reason.

Please note: There are some states, provinces and local jurisdictions that MANDATE the establishment of workplace safety committees and have set forth specific requirements regarding their establishment and operation. As always, please ensure that you have incorporated any pertinent local requirements into your implementation of this section of our Safety Policies and Procedures. It is the responsibility of

the Regional Safety Director to ensure that local and Company requirements are reconciled into a compliant, effective policy.

General Responsibilities for the Driver

Policy

A manager should be aware of the driver responsibilities as outlined below. The definition of “driver” shall also include any mechanic or dispatcher, or any employee assigned to operate a Company vehicle. These procedures are designed to provide the driver with information and guidance on a wide range of issues affecting motor carrier safety. The responsibilities outlined below are not all inclusive, but instead are intended to provide drivers with basic information necessary to comply with Company policies and procedures. Managers should relay this information to the driver pool.

Responsibility

Drivers must follow the safety-related driving procedures listed below. If these procedures are violated, disciplinary action will result.

Procedures

Seat Belts - Drivers and monitors/attendants are required to wear seat belts at all times while the vehicle is in operation. Where seat belts are standard equipment, passengers should be reminded to use their seat belts when boarding the vehicle. State and provincial regulations should be followed. Where applicable, passengers and Child Safety Restraint Systems (CSRS) are secured in their seats at all times when STA/STC vehicles are in operation.

Passenger Distribution/Capacity - Drivers need to properly distribute passengers for driving safety, and to follow proper vehicles passenger recommendations.

Speed Limits - Drivers must obey posted speed limits at all times. If hazardous conditions warrant, drivers must adjust speed accordingly. Any driver who violates this speed limit policy will be subject to disciplinary action, up to and including termination.

Defensive Driving - The driver is responsible for the safe operation of the vehicle. While driving, drivers should be alert and aware of their surroundings. They should never rely on a student or other passenger for guidance during driving maneuvers, including the current lane of travel, the adjacent lanes and those vehicles occupying these lanes. Keeping close watch can help a driver respond correctly and promptly.

Backing - Backing is an extremely hazardous maneuver and should be avoided whenever possible. District-created routes that require back-up maneuvers should be communicated as unsafe with a request to the District to consider other alternatives. If a backing maneuver is unavoidable, a guidance

spotter should be used whenever possible. The driver is responsible for the bus while in motion. (The local branch may determine if dispatch assistance should be requested.)

Passing - Failure to pass safely indicates faulty judgment on the driver's part, as a defensive driver, and their failure to consider one or more of the following factors that needs to be checked:

- Is there enough room ahead?
- Is there adequate space to move back into the current lane of traffic after passing?
- Has the driver signaled their intentions?

Encroaching on Other Traffic Lanes - Observant defensive drivers will not usually get trapped when other drivers change lanes abruptly. In the same manner, entrapment in merging traffic can be successfully avoided by a good defensive driver with a little pre-planning and willingness to yield. Blind spots are not valid excuses for this kind of accident; but allowances must be made in areas of limited sight distance.

Turning - Turning, like passing, is a dangerous maneuver and demands special care and an observant eye from a defensive driver. Drivers should be aware of other vehicles in their path and of the complete configuration of the turn they are about to undertake.

Pedestrians - A sensible defensive driver should always assume that if there is a pedestrian (or small vehicle of some sort) involved in a situation, slowing down is the driver's best defense. Managers should encourage drivers to give people and small vehicles the benefit of the doubt.

Extreme Weather and Road Conditions - Bad weather and other road hazards place special stress upon any defensive driver. Drivers should rely on their Defensive Driving skills training. If a driver absolutely must continue, slowing way down and increasing their following distance are the best defenses, along with overall increased awareness. All STA/STC drivers will be educated on the dangers of, and the Company's expectations for, driving in extreme weather and road conditions.

STA/STC's expectation that applies to all of the situations described below is that a driver is required to contact their immediate supervisor or night dispatch in the event that a delay caused by weather or road conditions will affect pick-up or drop-off times. (Please review your branch's local requirements and procedures.)

Road Construction - STA/STC realizes that chances are good that, from time to time, drivers will be faced with having to drive on roadways that are being repaired or that are under construction. Road construction presents several hazards; because of this, drivers are expected to approach road condition work zones the same way they would any other adverse driving situation, and follow these procedures:

- Reduce speed and maintain a safe following distance (per the Defensive Driving training).
- Drive at or under all special or reduced posted speed limits while traveling through road construction work zones.
- Be constantly aware of immediate surroundings, anticipate the possible actions of other motorists and expect sudden stops.
- Watch for and obey construction workers/flaggers and vehicles when crossing the roadway.
- Use the lane furthest from a construction zone whenever possible.
- Avoid sudden lane changes and use headlights and four-way flashers when traveling through construction zones.
- Follow temporary construction signals, when posted.

Road Hazards - STA/STC drivers should be aware of the potential danger of encountering various types of road hazards, including:

- Soft shoulders or severe pavement drop-offs that can cause rollover-type accidents.
- Road debris, such as tire recaps, metal or lumber, can cause severe damage to tires, tire rims, electrical systems and brake lines. Driver should be aware of the road ahead to identify potential road debris early and take safe and appropriate avoidance maneuvers.

Fixed Objects and Special Intersections - A good defensive driver will observe items in the area around the vehicle that might cause problems. Checking to be certain there is adequate clearance is the primary thing to watch. In the area of driveways, alleyways or entrances, the effective defensive driver will analyze the situation carefully, slow down, sound a warning when appropriate and be ready to yield to the other driver involved.

Following Distance - Tailgating is probably the single most common complaint and accident scenario. Here are some specific following distance guidelines:

- Use a 4-second interval at any speed up to 40 mph/70 km
- Use a 6-second interval at any speed over 40 mph/70 km
- Add extra time in bad weather, poor road conditions and/or while following large vehicles
- Add extra following distance if you are being tailgated

Curves and Turns - The biggest thing for drivers to remember in successfully negotiating curves and turns is to SLOW DOWN. In doing so, a driver will be able to make any needed adjustments in steering, as required by posted regulatory or advisory road signs.

Checking for Passengers - It is the responsibility of the driver and monitor/attendant (if applicable) to ensure that no passenger is left unattended at the end of each run or route.

It is recommended that the driver and monitor/attendant check their vehicle for remaining passengers at the end of the each run/tier/route, as designated by the Branch Manager. This may require the driver to pull their vehicle over at the closest, safest place in between tiers.

At the end of each work shift (AM, PM, Mid-day, Trip) prior to exiting the vehicle, the driver must perform a thorough final inspection by walking from the front of the bus to the rear while looking in and under each seat compartment for remaining passengers. A verbal announcement should be made. The passenger reminder system should be deactivated at this time. The driver is to walk from the rear of the vehicle to the front, performing a second check.

Absence of the passenger reminder system equipment does not relieve the driver and monitor/attendant of the responsibility to thoroughly inspect their vehicle for remaining passengers.

If it has been determined that a passenger has been left unattended for any period of time, the driver and monitor(s)/attendant(s) will be terminated.

Please Note: When a driver finds personal property belonging to a passenger, this may indicate that a passenger remains on the vehicle. They should be aware of the blind spot created while bending to retrieve such an item. An additional check should be performed in all of the areas across from, in front of and behind the seat where the item was found. Open windows should always be closed from the inside of the vehicle, not from the outside.

Anti-Idling Policy

STA/STC strongly recognizes the need to promote the health and safety of all passengers and staff, and to protect the environment from harmful emissions found in bus exhaust, in particular diesel exhaust, by eliminating the unnecessary idling of vehicles on STA/STC property or school property, including all schools or at any school-related activity to which passengers are being transported.

Procedure

The idling of commercial vehicles is governed by various local, state or provincial and federal regulations. It is the responsibility of the Branch Manager to understand, communicate and enforce these regulations dealing with idling vehicles.

Park-out Buses – Driver Policy

Overview

STA/STC may permit employees to park STA/STC-owned vehicles at their home or alternate site as an extra benefit to the school district and/or STA/STC. Park-outs are a privilege and are at the discretion of the Company, and may be revoked at any time.

Park-out Qualifications

To be considered for a park-out:

- Drivers must complete their probationary period
- Review of accident history
- Distance to fuel station
- Reliability of drivers
- Park-out locations must meet all code requirements of local municipal agencies
- Parking citations shall be the responsibility of the driver
- The vehicle must be in a safe and secure location
- Unloaded miles versus loaded miles

Park-out Agreement

The following are the responsibilities of park-out drivers. Failure to adhere to the following policies, at a minimum, will result in the suspension of an employee's park-out privilege.

- Any driver granted a park-out may not use an STA/STC vehicle for any personal use, including but not limited to: being off route or making unauthorized stops with the vehicle, such as fast food, the bank, grocery store, post office, etc. All exceptions must be authorized in advance.
- Drivers will not allow any person to ride on their bus with the exception of authorized passengers and assigned or pre-approved individuals, as mandated by the district and/or STA/STC.
- Park-out drivers must call in by radio prior to the sign-on time for their morning, afternoon and mid-day routes. In the event that the driver is late, a call to the terminal must be made immediately.
- Consideration must be given to the weather conditions that could potentially delay or disable the vehicle. If the driver encounters any difficulty with the vehicle, the terminal should be notified immediately.
- Upon request, park-out drivers will be required to bring the vehicle into the terminal for any reason.
- Supervisors may designate a day and/or time in which paperwork (DVIRs, time cards, trip sheets, mileage sheets, etc.) will be submitted.
- Drivers that park-out will be monitored to ensure that thorough pre-trip and post-trip inspections are completed daily. The driver will be monitored through random observation, completion of paperwork and during any evaluation or re-training. Qualified personnel will ensure that inspections are completed.
- Drivers that park-out will be required to walk the bus at the completion of each run/tier/route to check for hiding or sleeping children. They must immediately notify dispatch if a passenger is found.
- Drivers are required to allow sufficient time to pre-trip their park-out vehicle in the morning and to immediately report any defects to the shop. It can then be determined if the bus can be repaired prior to the route, or if the driver needs another bus. Drivers must not wait until the last minute to check their bus, since it would take time for the mechanic(s) to reach their park-out location.
- Drivers shall be responsible for keeping buses clean and in good condition.
- If a driver will be absent for any reason, including illness, it shall be their responsibility to return the bus to the facility so it is available for the route. An exception may be made if the illness is such that it would be unsafe for the driver to be behind the wheel.
- The bus shall have no less than half a tank of fuel and shall be returned to the facility prior to the sign-on time for the route. It will also be the driver's responsibility to pick up the bus after their absence to return to work.
- During holidays, drivers are to start their bus every other day or so to keep the batteries charged. Remember to turn off all lights, radios, etc.

Activity/Charter Trip Recommendations

An activity/charter trip is the transportation of passengers to an activity, athletic event and/or educational event, other than home-to-school transportation.

An activity/charter trip should be a positive experience for all people involved. The success of these trips depends greatly on the organization of the trip from the beginning to the end. The Branch Manager

and/or dispatcher is primarily in charge of the booking of activity/charter trips and the gathering of the information necessary to successfully accomplish these trips.

Be sure to ask, while the trip is being booked, if the group may be transporting extra equipment. In no event shall aisles, doors, steps or emergency exits of the vehicle(s) be blocked.

The Branch Manager and/or dispatcher is then responsible for assigning a driver, or drivers, to the extra trip(s). There should be a fair, systematic process for assigning extra trips to the drivers at each location. Most operations designate a period of time before newly licensed drivers are allowed to drive activity/charter trips alone. This time period is established so that specialized training may be provided.

At the completion of an activity/charter trip, the driver and monitor/attendant (if applicable) are required to walk the bus to check for hiding or sleeping passengers and/or any personal belongings.

Federal school bus accident reports indicate that many of the serious and/or fatal accidents each year occur on activity/charter trips. The leading causes are as follows:

- Unfamiliar with the bus
- Unfamiliar with the area (mountains, freeway, etc.)
- Unfamiliar with the route being traveled
- Not properly trained
- Improper planning of the trip
- Improper spacing between buses on multi-bus trips. (Each driver must have their own set of driving directions.)
- Faulty equipment

In order for our drivers to provide the best service possible, they should be given all information and training available in order to be prepared and to carry out the assignment with professionalism. This includes providing the driver with all necessary after-hour and emergency contact information. Our drivers' success, or failure, reflects directly on us and the STA/STC family.

Consult local, state or provincial and federal codes, including the Company handbook, for all laws and regulations designed to prevent activity/charter trip accidents.

Facility Safety

Policy

STA/STC is committed to maintaining a safe working environment for all of its employees. It is the policy of STA/STC that all appropriate employees are trained in and follow safe practices concerning commercial vehicles, housekeeping, machines/equipment and other general facility safety issues.

Responsibility

Employees may only operate equipment that he/she is qualified to do so through Company training. This will include special training on tow equipment or snow plow vehicles.

All employees are required and expected to adhere to pre-operating and operating procedures. Failure to do so will result in disciplinary action, up to and including termination.

Management must properly train employees on the use of equipment at the facility. Only those employees properly trained will be utilized for designated equipment. Supervisory staff is expected to monitor the safe or unsafe practices of employee use of equipment and offer direction or correction, which may include formal disciplinary actions.

Housekeeping

Good housekeeping is one of the most visible signs of management and employee concern for safety and health that a company displays on a day-to-day basis. Orderliness in the workplace contributes to a safe working environment by minimizing obstacles and potential safety and health threats such as slips, trips, falls, etc.

The main purpose of the housekeeping written procedures is to set standard guidelines for daily, weekly, monthly and even annual clean-up procedures. Setting such standard procedures saves money by streamlining area maintenance and providing an ongoing effort that keeps disorder from getting out of control, or becoming a danger.

These written procedures cover general housekeeping at STA/STC. All of these rules are to be housekeeping standards of practice in order to help ensure a safe working environment at all times, in all areas of the Company.

These housekeeping procedures are to be performed as needed to maintain the workplace in a clean and safe environment.

Pandemic Preparedness

Bus Interior Cleaning and Disinfection

From time to time, it may be necessary to do the following:

- Enhance the washing and sanitizing procedure by misting or treating each vehicle at the conclusion of the morning route with an approved disinfectant solution. The solution should dry in time for the afternoon route, with any excess being wiped off at that time.
- To assist in controlling the spreading of germs that cause infectious illness, each bus will be equipped with a container of sanitizing wipes and a bottle of sanitizing hand gel. The wipes are to be used daily on the handrails of the bus and other areas of greatest possible contamination. The sanitizing hand gel will be available for the driver and passengers to use at all times.

- Each bus will be equipped with a box of tissues and a garbage can for passenger use. Each tissue box and garbage can will be secure in a location at the front or back of the bus to meet State Police regulations. Passengers will be encouraged to use the tissues and dispose of them properly in the garbage can.
- For further disinfecting needs, each bus will be treated every ten (10) days, or as recommended by the approved disinfectant manufacturer. The bus will be misted inside with an approved disinfectant. This product will be accepted and recognized as a successful process for use in hospitals, school buildings and other public venues, established to kill MRSA, Influenza S and other viruses.
- Common areas such as the handrail/step area and the tops of the seats are the primary areas of concentration, but the entire inside of the bus will be treated. After a thirty (30) minute time period, the inside of the bus will be checked; any excess disinfectant will be wiped off. The bus can then be considered as being ready for use.

Upon notification by the school district/school board of a student(s) with an outbreak of any concern, or if a higher concentration of absenteeism due to illness is noted, the specific bus(es) involved will be treated with a more aggressive action. The disinfectant will be used as a fogger to treat the interior of the bus. The bus will sit undisturbed for recommended curing, at which time the interior will be inspected and any excess disinfectant will be wiped away.

This approach to the sanitation of the buses is designed to be a deterrent to the spread of illness and disease in the close quarters of the bus interior. We will continue to make every effort possible in keeping passengers safe from infection.

Plan for Employee Responsibility for Disinfecting Buses

The following is an example plan for addressing the preparation and application of the specified chemical/solutions mentioned above.

- Each driver will be given a spray bottle labeled as containing the disinfecting solution.
- The spray bottle nozzle will be kept on the “mist” setting.
- The bottle will be kept secured and upright in the driver area, away from passenger access.
- After the AM route is completed, while returning to the driver area from hanging the Child Check sign, each driver must mist the seats with the solution.
- The solution will be left to dry until the afternoon route. At that time during the interior inspection, the driver will wipe off any excess solution that has not dried.
- Replenish the bottle from the solution refill stations inside each location.
 - Each driver will be supplied with a box of tissues, a bottle of sanitizing hand gel and a container of disinfectant wipes.
 - Each driver will encourage passengers to cover their mouth and nose and to use tissues when coughing and/or sneezing. Use the sanitizing hand gel if necessary and dispose of tissues properly.
 - Each driver will use the disinfectant wipes to keep the handrails and any other high volume contamination area wiped clean, including the driver area.
 - Each driver will have access to eye protection, gloves and masks if needed while misting the interior of the bus. Drivers should refrain from using the ones from the spill kit.

Refill Station Duties

Management Responsibilities

- Management will make sure all supplies are available for the solution refill station(s).
- Management will replace spray bottles if they are malfunctioning or leaking.
- Management will ensure that all MSDS labels are intact at all times.
- Management will ensure that the MSDS sheets are included in the “Right to Know” station.
- Management will ensure that the duties, as assigned, are being followed.

Maintenance Responsibilities

- Maintenance staff or a trained employee will keep the solution refill station replenished within the location.
- Maintenance staff or a trained employee will mist and/or “fog” the buses every ten (10) days.
- Maintenance staff or a trained employee will “fog” a bus whenever required.

Machine Safety/Equipment Usage

Written machine safety and equipment usage procedures establish guidelines to be followed whenever any employee works with machines or equipment at STA/STC. The following established rules are to be followed:

- Provide a safe working environment
- Govern operator use of machines and equipment
- Ensure proper care and maintenance of machines and equipment

Written machine safety and equipment usage procedures establish uniform requirements designed to ensure that machine/equipment safety training and operation/maintenance practices are communicated to and understood by the affected employees. These requirements are also designed to ensure that procedures are in place to safeguard the health and safety of all employees.

STA/STC permits only trained and authorized employees to operate machinery and/or equipment at any time. This policy is applicable to both the daily operations and to those who occasionally have cause to use machinery or equipment. Operating manuals and specific directions are kept on file in a readily available location for those qualified employees.

Personal Safety Policy

Policy

STA/STC's first concern is for the safety, health and well-being of its employees. Therefore, this policy has been created to help ensure that our employees remain safe and secure in their individual roles. This policy and its related procedures will cover the following topics:

- Employee safe conduct and behavior
- General workplace safety
- Personal safety and security procedures (driver-specific)
- Back injury safety and proper lifting techniques
- Slips, trips and fall protection/prevention procedures

Responsibility

STA/STC expects its employees to behave and conduct themselves in a safe and responsible manner at all times. Employees who engage in activities that are considered unsafe, reckless or that threaten the safety of others will be subject to disciplinary actions, up to and including termination.

It is the policy of the Company to provide a place of employment reasonably free from hazards that may cause illness, injury or death to employees. It is also the Company's policy to establish an effective and continuous safety program incorporating educational and monitoring procedures maintained to teach safety, correct deficiencies and to provide a safe, clean working environment.

All supervisors, managers, directors and officers are responsible for the enforcements of safety policies and practices.

Procedures

General Workplace Safety

STA/STC believes that the safety of our employees is of utmost importance and will help drive the quality of our service, the productivity of our employees and the profitability of the Company. Therefore, employees will be guided by the following safety principles:

- The prevention of bodily injury and safeguarding of health are the first considerations in all workplace activities, and are the responsibility of every employee at every level.
- All employees at every level are responsible for knowing and following all STA/STC written safety policies describing the safe work practices to be followed in all workplace activities.
- Off the job, all employees should be similarly safety-conscious and be aware of potential hazards.

Organizational Role

STA/STC supervisors are directly responsible for the enforcement of all Company safety policies and practices. They must ensure that employees under their direct supervision are trained in appropriate

safety practices and procedures, and that they follow safe work practices at all times while performing daily work activities.

If an employee is found to be violating safe work practices or procedures, the supervisor is responsible for disciplining the employee and reinforcing the correct safe behavior or activity. Discipline will depend on the severity of the safety rule infraction, and may include measures up to termination.

All STA/STC supervisors, managers, directors and officers will ensure that all safety procedures are compiled with, including the following:

- Their staff members are trained in appropriate safety procedures.
- They notify the responsible immediate supervisor, and complete the necessary forms if an accident or work-related health problem occurs in their department.
- Equipment and property within their area of responsibility is maintained in a safe and hazard-free condition.
- All containers must be properly labeled with contents.
- The written hazard communications program (if required), and the general “Right to Know” training (the general training – not chemical-specific) for all employees.
- Developing, completing and filing all necessary documentation and/or reports to meet local, state or provincial and federal reporting and recordkeeping requirements, and working with local and state or provincial agencies (as needed).
- Maintaining the master MSDS binder and ensuring that departmental/area MSDS binders are kept current.
- Completing all employee/driver hazardous material training (if required).

All employees are required to do the following:

- Comply with all local, state or provincial and federal rules and regulations relevant to their work.
- Observe all Company rules and regulations related to the efficient and safe performance of their work.
- Integrate safety into each job function and live by this philosophy in the performance of their job duties.
- Report unsafe equipment and practices.
- Report any accidents, or near misses, that occur while on the job.

Statement of Intention to Comply with All Government Regulations

STA/STC will comply with appropriate safety and security laws and regulations, such as those established by the following:

- Occupational Safety and Health Administration (OSHA)
- Environmental Protection Agency (EPA)
- Department of Transportation (DOT)
- Canada D250 Standards
- Canada Labor Code (CLC)
- Highway Traffic Act (HTA)
- Service Ontario E Laws
- Ministry Transportation Ontario (MTO)
- Department of Justice (DOJ)
- Environment Canada (EC)
- Transport Canada (TC)

- All other applicable local, state or provincial and federal safety and health regulations

Back Safety and Proper Lifting Techniques

Back safety awareness and safe lifting guidelines are necessary due to the prevalence and severity of back injuries throughout all industries. Backs can be injured by improper lifting, falling, stretching, overextending and other workplace mishaps. Of these, using improper lifting techniques (as in hand loading or unloading activities) are the largest single cause of back pain, strain and injury. To reduce the incidence of back injury, the Company has instituted (and all STA/STC employees will be trained in) the following proper lifting techniques/procedures and other back safety measures.

When required to perform lifting activities, employees are expected to do the following:

- Size up the load before lifting. Test by lifting or pushing a corner of the object; if it is heavy or feels too clumsy get a mechanical aid or help from another. When in doubt, employees are expected to obtain help and to never attempt lifting alone.
- Bend the knees. Bending of the knees is the single most important aspect of any lifting activity.
- Place feet close to the object and center yourself over the object.
- Get a good, firm handhold.
- Lift straight up and smoothly, allowing your legs to do most of the work.
- Avoid overreaching or stretching to pick up or set down an object.
- Avoid twisting or turning of the body once the lift has been made.
- Make sure beforehand that a clear path is available to carry the object.
- Set the object down properly, keeping the back straight at all times.
- Always push, not pull, objects when possible.
- Change the lifting situation, if possible, to minimize lifting hazards.
- Split the load into several smaller tasks to achieve management lifting weight.
- Avoid lifts from below the knees or above the shoulders.

Other work-related back safety issues include:

- Extended sitting or standing - A driver's role requires long hours of sitting behind the wheel; this condition can create back trouble. When possible, it is recommended that drivers stretch frequently in order to reduce lower back pain.
- Poor physical condition - An employee's physical condition can lead to back pain. Being overweight can cause extra strain on the spine. An estimate is that every extra pound upfront puts ten pounds of strain on the back. Being out of shape or overweight increases the chances for chronic back pain. Infrequent exercise is also a major factor. A sudden strain on generally unused back muscles leads to trouble, particularly when there is a sudden twisting or turning of the back. It is recommended that employees exercise regularly and maintain a proper diet.
- Entering and/or exiting vehicles – Employees are expected to enter and exit Company vehicles using three points of contact at all times. Jumping from any vehicle or other equipment is strictly prohibited.

Slips, Trips and Fall Protection and Prevention Procedures

Most work-related injuries, especially those related to slips, trips and falls, are preventable. Consequently, all employees will be:

- Trained on the proper methods for entering and exiting vehicles and other Company equipment (3-point contact).

- Instructed on the required footwear and clothing that is appropriate for the employee's job description, weather conditions and workplace situations, and that help to prevent these types of injuries.
- Trained on how to recognize and avoid slip, trip and fall hazards.

Injury Reporting and Return-to-Work

Policy

STA/STC has a high commitment to safety and injury prevention on the job. However, there may be times that injuries occur at the workplace or while a driver is on the road. In these instances, it is important that everyone follow the injury reporting procedures that STA/STC has established. These procedures are intended to ensure that an injured employee receives the proper medical attention as promptly as possible, and that the Company is able to fully comply with Worker's Compensation regulations (U.S.) or the Worker's Safety Insurance Board (Canada).

Responsibility

STA/STC's Human Resources and Safety Managers must consistently apply the procedures set forth in this policy. Every injury must be reported and similarly situated employees must be given equal consideration for light duty and return-to-work procedures.

Employees have the responsibility to report all injuries occurring at the workplace, including seemingly minor ones. In order to be considered for the return-to-work program for any injury or illness, employees must follow the procedures set forth by the Company, including any medical evaluations and follow-up visits.

Injury-reporting Procedures

Minor Injuries

All employees are required to report any injury that occurs on the job, no matter how minor it may seem. Some examples of minor injuries would include a small cut, falling down a short set of stairs or a back strain.

Injuries must be reported to their immediate supervisor, a representative from Human Resources and/or a Company designee as soon as possible, but no later than 24 hours after the occurrence.

When an injury is reported, the immediate supervisor is responsible for interviewing the involved employee and completing a written report of the facts surrounding the injury. The involved employee and any witnesses are required to cooperate in the questioning in a truthful and straightforward manner. The employee may be instructed to seek medical attention if deemed necessary.

While injuries do occasionally happen, injuries that occur due to horseplay, misconduct or inappropriate behavior will result in disciplinary action for the involved employees. However, no employee should be afraid of reporting an injury, no matter how it occurred. Injured employees who were following Company safety rules will not be disciplined, and STA/STC will not tolerate any retaliation against the injured employee from any supervisor or co-worker.

Injuries that originally seem minor can evolve into larger medical problems; this is why it is crucial that there is documentation of the original incident so that the Company can properly handle any worker's compensation claims or other issues that arise from the injury in a fair and timely manner. Additionally, multiple minor accidents or injuries can be a signal to the Company that our safety practices in a particular area need improvement, or that our employees need additional safety training.

More Serious Injuries

When an employee is more seriously injured on the job, the first priority is to make sure that he/she receives the proper medical attention. Some examples of more serious injuries would include a broken limb, severe bleeding or an injury rendering the person unconscious.

If the injury does not necessitate emergency medical attention, but does require prompt attention from a medical professional, the injured employee should notify the immediate supervisor. The employee will be instructed to go to the hospital or clinic; transportation will be arranged if the employee is unable to drive themselves.

If the injury requires emergency medical attention, either the injured person (if able) or a fellow employee should notify management to immediately call 911.

UNDER NO CIRCUMSTANCES SHOULD EMPLOYEES TRY TO EXECUTE CPR OR MEDICAL AID THAT THEY ARE NOT TRAINED TO PERFORM.

A driver who has a serious medical emergency while on the road should pull the vehicle to the closest safe area, secure the vehicle and notify their supervisor immediately for assistance in seeking appropriate medical attention.

STA/STC will follow the same procedures for documenting the injury as explained in the minor injuries section of this policy.

First-Aid Kits

STA/STC must have the appropriate-sized First-Aid kits centrally located in the Company building(s), which will be in an area easily accessible to all employees. Designated Company representatives will inventory the supplies in these kits on a designated schedule.

Return-to-Work Program

STA/STC has a return-to-work program for regular full-time and part-time employees recovering from illnesses or injuries sustained on the job or away from work. Employees who have physical limitations from an injury or illness may have their job duties modified or may perform alternate duties until they are able to perform their regular jobs again. This work is considered "transitional work".

STA/STC defines "transitional work" as temporary, modified work assignments within the employee's physical abilities, knowledge and skills. Where possible, transitional positions will be made available to

injured workers to minimize or eliminate time lost. For any business reason, at any time, the Company may elect to change the position, such as working shift, location, etc., based on the needs of the Company. STA/STC cannot guarantee a transitional position and is under no obligation to offer, create or encumber any specific position for purposes of offering placement.

Canada: This policy is not intended to obstruct the procedures application to employees who are eligible for reasonable accommodation or who are covered under the Worker's Safety and Insurance Board (WSIB). Inquiries about WSIB should be directed to the Safety Department.

U.S.: This policy is not intended to obstruct the procedures applicable to employees who are eligible for reasonable accommodation or who are covered under the Americans with Disabilities Act (ADA), or leave of benefits under the Family Medical Leave Act (FMLA). Inquiries about ADA or FMLA should be directed to Human Resources.

In the event an employee refuses transitional work (outside their FMLA benefits period) and are within the restrictions and ability to perform the transitional position, STA/STC is not obligated to provide an alternative position. In such cases, STA/STC will notify the insurance carrier.

The return-to-work program has several objectives. First, STA/STC's goal is to help its employees. The return-to-work program allows employees to get back on the job more quickly after an illness or injury. Returning to work as soon as possible provides the following benefits:

- It keeps up the employee's self-esteem because he/she can continue to perform useful and meaningful work.
- It minimizes the employee's loss of income.
- It makes the transition back to regular duties easier, both physically and psychologically.

Secondly, STA/STC also benefits from the return-to-work program. An employee who continues to work, even in a restricted capacity, allows the Company to continue utilizing the employee's skills and maintains productivity.

Employees who were injured on the job and are receiving Worker's Compensation benefits will be required, if able, to participate in the return-to-work program. Participation in the return-to-work program is optional, but highly encouraged, for employees who become ill or injured away from the job.

Return-to-Work Procedures

If an employee cannot perform his/her regular job duties because of an illness or injury, the employee should remain in contact with his/her immediate supervisor a minimum of once per week.

When the time is appropriate (as determined by the Company, the employee and the medical professional treating the employee) for the employee to resume some form of work, the Company will request that a medical professional complete a return-to-work statement. The statement should summarize the employee's current physical abilities and what physical tasks the employee should not perform. (See Appendix for the Return-to-Work form.)

Management will share and review the recovering employee's job description with his/her medical professional to help the treatment provider better understand the employee's job and to prepare a more thorough return-to-work statement.

Once completed, the return-to-work statement should be sent to STA/STC. Responsible personnel will forward the statement to STA/STC's insurance company and the employee's supervisor.

STA/STC does have the option of requiring the injured or ill employee to see a qualified medical professional specified by the Company. STA/STC may require this for the initial return-to-work examination and statement, or any time during the employee's recovery.

Return-to-Work Duties

Based on the medical professional's return-to-work statement, a return-to-work program representative (if assigned) and the employee's supervisor will determine what regular job duties the employee can perform, what job duties the employee can perform with some modifications, or if the employee should be given alternate duties. A returning employee's temporary job duties may be a combination of regular, modified and alternate duties.

While the assigned work may be considered "light" in terms of its physical demands (if that is what is necessary, based on the injury or illness), all returning employees will be asked to perform tasks that are necessary and meaningful to STA/STC's operations.

In the case of a driver in the return-to-work program, STA/STC will first assess the driver's return-to-work statement and will determine if the Company has driving duties the employee could continue to perform within his/her restrictions. If continued driving is not an option, STA/STC will try to assign alternate duties that are not driving-related to utilize the employee's specialized knowledge and skills. This could include, for example, duties in dispatch, log auditing or the training of other drivers. If this is not a workable option, the driver may be assigned other duties at STA/STC's facility.

Returning employees who have concerns about their return-to-work duties should consult their immediate supervisor and/or a Human Resources representative, or their medical professionals. Under no circumstances will employees be assigned tasks, or allowed to do tasks, that do not meet the approval of a medical professional.

Because the return-to-work program is intended to be a transition back to an employee's original job, employees in the return-to-work program will not be allowed to keep their alternative job duties after they have recovered.

Periodic Re-evaluation

Employees in the return-to-work program must be re-evaluated by a qualified medical professional on a schedule agreed to by the employee, medical professional, immediate supervisor and Human Resources representative. After each re-evaluation, the medical professional should prepare a written statement concerning the employee's physical progress. The employee will submit this statement to STA/STC. As the employee's recovery continues, job tasks may be reassigned to match the employee's increased ability. When the medical evaluation indicates that the employee can resume his/her original job, the employee will do so.

Revision of Best Practices Manual

The STA/STC Safety Council shall review the manual annually, at a minimum, and shall propose and approve appropriate revisions. In addition, local regions may propose additional topics to the Safety Council for review, approval and inclusion.

The Safety Council may, at any time, propose revisions to the manual in response to changes in exposures to workplace hazards, changes in applicable laws, to help increase employee and public safety or to correct errors or omissions.

Distributions of manual revisions will be made via the Company intranet.

Dissemination Beyond STA/STC

The Company recognizes that, from time to time, it may need to share the manual with outside parties such as customers and labor unions. In such cases, dissemination of the manual or any excerpts shall occur only upon approval from the Regional Safety Professional, Regional Chief Operating Officers or the Vice President(s).

Forms and Addenda to Best Practices Manual

Addenda are required to address when local and state or provincial regulatory matters, and regional business operational safety and health requirements, supersede Company policy. In addition, regions may include additional topical sections not covered by this manual.

The Safety Council Chairperson shall review, approve and retain all recommended addenda from the Regional Safety Professional (and future changes to addenda) prior to implementation.

Applicant/Manager DUI Interview

Employee Candidate, Branch/Terminal Manager, VP of Operations

Please complete this form to document the results of your interview regarding this applicant's prior DUI conviction. To be considered for employment the date of the DUI conviction must be at least fifteen (15) years ago.

Applicant Name: _____

Current Date: _____

DUI Conviction Date: _____

Employee:

I have been interviewed and have explained the details of the DUI conviction dating back to _____ (yr.). I understand my responsibility to provide our passengers with the safest transportation possible and the potential negative impact this incident could have on STA/STC in the future. I have communicated in my own words the steps I have taken to ensure I am never in this position again:

Employee Signature: _____

Date: _____

Terminal/Branch Manager:

I have reviewed and discussed this incident with this employee candidate. After a full review of their past school vehicle driving history, I am convinced that they understand the company's goal to provide our passengers with the safest transportation possible. I have discussed this situation with the Regional VP of Operations.

Terminal/Branch Manager Signature:

VP of Operations Signature:

Date: _____

Date: _____