



# DRIVER SAFETY AND COMPLIANCE MANUAL



*Keeping Graham safe one driver and load at a time. Handling transportation needs since 1997.*



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## Welcome to Graham Trucking, LLC

Starting a new job is exciting but can be overwhelming. This driver handbook is designed to answer your questions and point you in the right direction. Hopefully, most of your questions were answered in orientation however, by providing this book you will have a quick reference to help you as you learn about Graham Trucking, LLC and J&J Services, LLC.

As a new driver at Graham, you are our most important resource. Our goal is to provide the highest level of Customer satisfaction, which is greatly impacted by you. By satisfying our customers they will continue to do business with us and recommend us to other customers. This will benefit Graham Trucking, LLC and you by continued growth and availability of freight.

This process begins with you as a driver. Our reputation depends on your actions and the way you represent our company. Please be courteous and professional, as you directly affect the customer's perception of Graham Trucking, LLC.

This handbook explains our procedures and policies and provides all the necessary permits you will need. Since the inception of Graham Trucking, LLC in 1997, we have seen tremendous growth in our organization. As we grow and change it will be necessary to make changes to this book. We will keep you informed as these changes are made.

We are thrilled you have decided to join the company and hope you will find it both challenging and rewarding. Welcome to the family!



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## Mission Statement

Graham Trucking's mission is to be the "Best in Class" Transportation Provider, with the highest level of customer satisfaction, at a competitive cost and the highest level of profitability and safety. At Graham Trucking we want to provide a great environment for our drivers, their families, and our customers while delivering superb service and professionalism.

Management and employees will improve the quality of service, customer satisfaction, and cost through a process of continuous improvement and teamwork.

Graham Trucking, LLC is focused on providing a full range of transportation services through continuous improvement and training. We will exceed our customers' expectations with quality and dependability.



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## **Your Responsibilities**

**Driver responsibilities are listed below in order of priority**

Read and understand the contents of the Rush trucking manual. You are responsible for 100% of its content.

- Drive a tractor/trailer or straight truck in a safe and efficient manner.
- Load and Unload freight in a safe manner.
- Ensure that all freight picked up or delivered is:
  - o Checked in and properly recorded
  - o Secured properly
  - o Loaded according to vehicle size and weight restrictions
- Comply with all Graham Trucking safety standards including submitting all documents as requested.
- Ensure all overages, shortages, and damages are reported on time and properly to your Driver Manager, CSR or Load Manager
- Complete the following as needed according to our standards:
  - o Standard forms
  - o Pre/Post Trip Inspection
  - o Electronic Logs(ELD)/Log Books
  - o Inspect and Report the following Accidents
  - o Incidents
  - o Injuries
  - o Freight overage, shortage or damage
- In accordance with Graham procedures:
  - o Please extend courteous behavior to the motoring public, shippers, plants, enforcement officers and fellow drivers.
  - o Be well acquainted with the Federal Motor Carrier Regulations and obey the provisions relating to drivers, equipment, and cargo being transported in states and municipalities in which you operate.
  - o pick up and deliver freight on time without exception.
  - o Drive only when you are in good mental and physical health.
  - o Always carry you medical examiner's certificate and CDL.
  - o Wear glasses or any other devices as required by your medical examiner or as required by your CDL.
  - o Never operate a vehicle while you are impaired by fatigue, illness or any other condition that may make it unsafe for you to drive.



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## **Job Requirements (knowledge, skills and abilities)**

- Driver must comply with DOT regulations.
- Driver must be at least 23 years of age.
- Driver must have a commercial driver's license Class A.
- Driver must be able to pass a DOT physical and drug screen.
- Driver must maintain a valid CDL with no more than six (6) points or any speeding violation of 15 miles over speed limit or greater in the last twenty-four (24) months
- Driver must have the ability to understand and accept directions.
- Driver must have a good understanding of using a map.

### **CDL Renewals**

A copy of the CDL must be submitted to the Safety Department on or prior to the expiration date. Failure to comply will result in suspension until a valid copy has been received. All medical cards must be taken to the DMV and connected to the license within 15 days of renewal. If failed to do so, DMV downgrades license to a regular driver's license. Graham Trucking's safety department must get a copy of updated medical card and confirmation of connection to license.

### **Driver Violations**

Drivers are required to notify the state in which he/she is licensed of any violation of state or local law relating to motor vehicle traffic enforcement in another state. This does not include parking violations. FMCSR Part 383.31.a requires this notification must be made by the person either convicted or found to have committed the violation. Drivers are also required by this part to notify the motor carrier within 24-48 hours after the citation was issued.

#### **Notification to the State**

This must be done in writing and must contain the following information:

- Driver's full name
- Driver's license number
- Date of conviction
- Nature of violation
- Indication if the violation occurred while in a commercial vehicle



**\*As a company, ALL inspections must be turned into the office and we will fax or email in awareness of inspection if a violation is made on a roadside inspection. If driver receives a ticket, you must notify the safety department as well.**

### **Notification to Graham Trucking on any violation**

**Notification to Graham Trucking may be in person or done by phone and the driver must provide a copy of the citation issued.**

**FMCSR Part 383.33 states that a driver is required to notify the motor carrier if their license has been suspended, revoked, or cancelled. This notification is required by the end of the business day following the driver's disqualification. Any driver who ignores this requirement will be terminated. Any driver found to be operating a commercial vehicle for Rush Trucking without a valid CDL will be terminated.**

### **Annual Review of Driving Record**

**Each driver is required by FMCSR Part 391.27 to report to the motor carrier at least once each year all violations other than parking tickets that he/she has received in the last twelve months. We will provide a form to record this information on to you prior to the expiration date. This form must be completed, signed and sent in to the Safety Department. The Safety Department will then obtain a copy of your Motor Vehicle Report (MVR) to review your driving record.**

### **Physical Requirements**

**Every driver must be re-certified every 2 years or less by a physician. You will be given a reminder as to the expiration of your DOT physical and must have a re-certification prior to the expiration date. If we do not receive a copy of your DOT physical you will be placed on suspension until we receive one. If you are having difficulty finding a clinic to get your physical renewed please contact the Safety Department at 662-449-8367.**

### **Appearance and Attitude**

**Graham Trucking expects that all of our drivers be professional. Whether you are with a customer, talking to another driver or associate, or at a truck stop pumping fuel. Your attitude should reflect positively on the company.**

**Graham Trucking also requires you to look professional. Drivers should always be clean and neat. You may wear a T-shirt and jeans, no sleeveless shirts or open-toed shoes such as sandals. You are not allowed to wear any open-toed shoes in the plants or**





suppliers facilities. Graham clothing is available throughout the year. You can contact your dispatcher to get more details.

**\*Please make sure that you have the following items with you as they are required quite often at shippers and or receivers:**

**Safety Vest                      Steal toed shoes                      Pants                      Safety goggles**

### **Consequences for Lack of Communication**

Communication is the most important function of a Graham Trucking, LLC driver. Graham Trucking has secured contracts with companies that requires great communication and excellent service. In these contracts, Graham has agreed to on-time pickups and deliveries. This means, in some cases, that if we shut down a plant, Graham trucking may be held responsible for the damages incurred for service interruptions.

These damages can run as high as thousands of dollars for time that production is lost. The only way that we can prevent a plant shutdown is by communication. If we are aware that a truck is running late, we can in turn notify our customers and they can make alternate arrangements. This notice allows them to continue with production without expensive delays. If we do not communicate that we are running behind or that a problem has arisen Graham Trucking will be held responsible for interruption in their production schedules.

**If you have any problems at any time making your scheduled pick up or delivery  
you MUST notify your dispatcher IMMEDIATELY!!**

**Any liability Graham Trucking is held responsible for due to negligence will be recouped by truck owner. Let's all work together to provide a great service by good communication all the way around.**



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## Payroll Policy

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All drivers and trucks are paid weekly, after a one week hold back. Graham Trucking utilizes a computer-generated mileage program to compute miles through Rand McNally address to address on short routes. Should you have any questions regarding payroll, please call the office and speak with the Operations Manager. Remember ALL paperwork MUST be turned in before Monday morning at 0800 am in order to guarantee pay on Friday. We can not and will not pay for trips without the proper paperwork; this means a valid bill of lading that has proof of delivery.

Paperwork MUST include the following:

- Weekly Report Sheet fully filled out correctly
- All signed BOL's
- Weight tickets (if required)
- Reimbursements

All weekly checks are paid each Friday by direct deposit. Check stubs are inside the office until Friday at 1700 then are placed in envelopes in the mailbox by the shop.



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## Positional Options

### COMPANY DRIVERS

Competitive pay up to .41 cents

Raise each year

cash advance weekly

Paid weekly by direct deposit

well maintained equipment

Home weekends and throughout the week

Blue Cross Blue Shield medical and dental insurance

Short and long term disability

Life insurance and accidental insurance

Week vacation after one year of employment

Major holidays off

Personal dispatch with one person

Fuel Bonus Monthly

Driver of the Quarter

Safety related awards and recognition

Opportunity to enter the Lease Purchase Program



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## **Lease Purchase Program**

**Low mileage, well kept trucks**

**No down payment, low weekly payments**

**.95 plus FSC on ALL miles, loaded and empty, raise option yearly**

**Maintenance taken care of in house**

**Fuel Discount**

**Paid weekly by direct deposit**

**Medical, Dental, Vision, Short and long term disability offered**

**Home weekends and throughout the week**

**Opportunity to grow your fleet**

## **Owner Operators**

**1.00 plus FSC**

**Fuel Discount program**

**Maintenance Discount on parts and such in Memphis area**

**Paid weekly by direct deposit**

**Exceptional hometime**

**Dispatch to prime areas**

**Tag Program**

**Company Driver Pay Scale**



All drivers coming in as a company driver will start out at .38 base and be graded on a point system to gauge starting pay.

- Each clean inspection on PSP +5 points
- Each log book violation on PSP -2 points
- Speeding Ticket, other moving violaton -3 points
- Each accident/incident reported -7 points
- Years of verified experience +5 points per year
- Less than 3 jobs in a year +5 points
- Clean MVR +5 points

Once these are calculated, the extra cents per mile will be added to the base pay.

- Negative Points will start at base
- 0-10 gets .01 added to base
- 11-20 gets .02 added to base
- 21-above gets .03 added to base

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#### Company Driver Pay at Yearly Review

Each driver during review time will be evaluated on performance and through the below point system to evaluate pay. Performance based pay is strictly up to the driver throughout the year. This scale will start at current pay and either increase or decrease from there.

- Driver Lates -1 per late
- Good Inspections +2 points per good inspection
- No accidents/incidents +2 points
- Each accident/incident -5 points per occurrence
- Time with company(anniversary) +5 points
- Violations on an inspection -1 point per violation
- Violations on MVR -4 points each
- Any safety awards received within year +5 points
- Driver of the Quarter +10 points
- Attending safety meetings +/- 4 points per meeting
- Attending company sponsored events +3 points per event
- Log book violaton percentage(40%) -/+5 points if over or under
- Average of 10,000 miles per month +5 points

- Negative points will subtract .015 cents
- 0-10 points will increase pay by .005
- 11-20 points will increase pay by .01
- 21-30 points will increase pay by .015
- 31-40 points will increase pay by .02
- 41-50 points will increase pay by .025
- Over 50 points will increase pay by .03

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#### Lease Purchase Pay

Lease purchase will have the same point system on their annual review. Their scale will be as follows:

- 10 points to 20 points will increase their pay by .005
- 20 points and above will increase their pay by .01



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## Company Phone Directory and Important Information

**Home Address:**

Graham Trucking, LLC  
920 Old Hwy 51  
Nesbit, MS 38651

**Mailing Address:**

Graham Trucking, LLC  
PO Box 402  
Nesbit, MS 38651

**Office Phone:** 662-449-8367  
662-449-2597  
662-449-4687

**Fax Number:** 662-449-3267

**Website:** [www.grahamtruckingllc.com](http://www.grahamtruckingllc.com)

**Email:** [janaelogan@att.net](mailto:janaelogan@att.net)

**Gate Code:** 0290

**Office Hours:** Monday-Friday 0800-1700

**After Hours:** 662-449-8367  
901-489-1838 (Operations Manager)

**MC:** 38672

**FID:** 68-0571633

**DOT:** 744970

**President:** Joseph Graham



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## Safety Guidelines Policy

Graham Trucking, LLC is committed to maintaining a safe working environment for all its employees. Graham Trucking will comply with all applicable safety and security laws and regulations, such as those established by FMCSA, EPA, and OSHA and all other federal, state and local safety and health agencies. Graham will make every effort to assure that generally accepted safe practices are followed by all our drivers and employees.

### Safety Guidelines Procedures

The safety philosophy of Graham Trucking, LLC reflects and communicates our proactive attitude toward safety. All Graham Trucking, LLC employees have a responsibility to themselves and to the company for their safety and the safety of their coworkers.

All employees are required to:

- Comply with all federal, state and local laws and regulations relevant to their work.
- Observe all company rules related to the safe and efficient performance of their work.
- Integrate safety into each job function and live by this philosophy in the performance of job duties.
- Report or correct/repair unsafe practices and equipment.
- Report any accident that occurs while on the job.

### Disciplinary Procedure

All safety rules, regulations, plans and procedures in effect at Graham Trucking, LLC must be followed. Upon violation of any company safety rule, the violating employee will be disciplined. The list of possible disciplinary actions includes the following:

- Verbal reprimand: An informal discussion concerning the incorrect safety behavior will take place as soon as possible after the supervisor becomes aware of it.
  - Written reprimand: A written form that documents the safety misconduct will be presented to the employee and a copy will be placed in the employee's personnel file.
  - Warning of probation: A written form will document the safety misconduct and warn the employee that another incident of the behavior will lead to probation. This form will be presented to the employee and a copy will be placed in the employee's personnel file.



- **Probation:** A period of time during which the employee is given specific rules and goals to meet, along with the advisory that if those rules and goals are not met satisfactorily, the employee will be subject to termination.
- **Warning of suspension:** A written form that documents the safety misconduct and warns the employee that another incident will lead to suspension. This form will be presented to the employee and a copy will be placed in the employee's personnel file.
- **Suspension:** A period of time during which the employee is prohibited from being in the workplace and during which the employee is not paid.
- **Dismissal/Termination of Employment:** The permanent separation of an employee from the company, initiated for disciplinary reasons. Upon violation of any company safety guideline or rule, the employee will be disciplined. The severity of the disciplinary action will be in direct correlation to the severity of the safety violation.

Graham Trucking, LLC prides itself on being an industry leader in safety and service. We strive to continuously improve our performance in both of these areas. As a measure of continual improvement, Graham Trucking, LLC and its affiliated companies has revised and improved their log auditing process to better ensure that all drivers are operating within the guidelines of Federal Motor Carrier Safety Regulations. The following information is provided to ensure your understanding of the attached policy.

Federal Motor Carrier Safety Regulation 395.8(k) 1 requires Graham Trucking to maintain all drivers' records of duty status and all supporting documents for each driver it employs for a period of six months. Supporting documents include, but are not limited to, the following:

- Bills of lading
- Pros
- Freight bills
- Dispatch records
- Fuel receipts
- Fuel billing statements
- Toll receipts
- Cash advance receipts
- Delivery receipts
- Settlement sheets
- Documents related to carrier operations

Each driver is required to ensure that these documents are supplied to Graham Trucking in a timely fashion via office drop off or mailing. Drivers may retain originals of toll receipts for personal records.

All records of duty status must be accurately reflected. All records of duty status will be verified with supporting documentation for accuracy and legitimacy. Failure to submit supporting documentation, as required by the FMCSA, to Graham Trucking will result in disciplinary action, up to and including dismissal.





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## **Driver Qualification and Hiring Policy**

Graham Trucking believes that our employees are our most valuable assets, and that the success of the company is determined by the quality of its employees. Because of these beliefs, the personnel selections of the company are extremely important. The company is committed to hiring only the best and most qualified available drivers.

To help carry out this commitment, Graham Trucking has implemented the following driver qualification procedures.

### **Qualification Procedures**

Graham Trucking's driver hiring qualification standards and procedures have been developed to achieve two goals. The first goal is for the company to meet or exceed all Federal Motor Carrier Safety Regulations (FMCSR) concerning driver qualification. The second goal is to select only the best available drivers: drivers who share Rush Trucking Corporation's values and goals of operating in a safe, legal, and professional manner.

### **Hiring Standards**

**Minimum age of 23**

**Minimum of 2 years verifiable tractor-trailer driving experience**

**No more than three moving violations combined in the past three years as listed on the MVR/PSP**

**No "serious" violations in the past three years as listed on the MVR/PSP. Serious violations include: excessive speeding (15 mph over limit or more); improper or erratic lane change; following too close; a violation arising in connection with a fatal accident; driving a CMV without a CDL; driving a CMV without a CDL in the driver's possession; driving a CMV without the proper class of CDL and/or endorsements for the specific vehicle being operated; violating a State or local law or ordinance on motor vehicle traffic control prohibiting texting and/or prohibiting the use of a hand-held mobile phone while driving a CMV**

**No DWIs, drug or alcohol convictions and/or reckless driving violations in the past five years as listed on the MVR/PSP**



No more than three preventable accidents in the past three years as listed in the PSP; MVR and or the driver application

No serious preventable crashes in the past three years as listed on the PSP; MVR and/or driver application. Serious crashes include at fault rear-end collision; rollover; jackknife; head-on collision; etc.

Not have had three or more jobs in the past twelve months.

No failed alcohol or drug tests or refusals

No abandonment of equipment or under dispatch

*\*Any of the above serious violations could result in suspension and/or termination if gotten after employment begins.*

## **Application for Employment**

All driver applicants shall complete an application for employment furnished by Graham Trucking, LLC through our website([www.grahamtruckingllc.com](http://www.grahamtruckingllc.com)) with the application form containing all of the information required under section 391.21 of the FMCSR.

Graham Trucking's hiring standards require that driver applicants list all former employers for the past 10 years. Any gaps in employment for more than a one-month period must be satisfactorily accounted for on the application. A candidate will be rejected for falsifying information on the application.

## **License**

Graham Trucking, LLC's Safety Department will obtain a legible copy of the license of all driver applicants. The Safety Department will conduct a review of the license to be certain it is valid, has not expired, is the appropriate class for Graham Trucking's vehicles, has the appropriate endorsements, is issued by the applicant's current state of residence, and that the applicant possesses only one license. (FMCSR, Sec. 383.21, 23 and 391.11 (b)(7))



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## **Motor Vehicle Record (MVR)**

Graham Trucking will request an MVR for driver applicants being considered for employment after the company has received the completed and signed application for employment. A CDLIS report will also be ordered and a MVR will be requested from every state the report shows the applicants has held a license past 3 years. If an MVR request from a former state of residency comes back indicating 'no record found,' the MVR request will be placed in the driver's qualification file (if hired) as verification that Graham Trucking attempted to obtain the information.

Graham Trucking's Safety Department will review all MVR information to determine if driver applicant meets company hiring standards regarding driving record, and to compare against the application for employment to check for completeness and accuracy. (FMCSR, Sec. 391.23)

The MVR must clearly indicate the driver has self-certified with the active licensing state. If the report does not provide a self-certification date the driver will be required to provide proof of self-certification prior to being dispatched. This can be done by fax or online with most states.

## **Investigation of Previous Employment**

Graham Trucking, LLC will contact all former and current employers of the driver applicant for the previous 3 years to verify as much of the following as possible:

- Dates of employment
- Type of work performed
- Type of vehicle(s) operated
- Extent of driving experience and verifiable miles
- Vehicle accident record
- Attendance and reliability
- Overall work history and performance
- Record of misconduct regarding employment policies.

All former and current employer information gathered from Graham Trucking, LLC's inquiries must be in writing and will be retained in the driver's (if hired) qualification file. In the event a former or current employer refuses to release information, a note stating this will be placed in the file.



Graham Trucking's Safety Department will review all former and current employer information to determine if the driver applicant meets company hiring standards regarding past and current employment, and to determine if the applicant was truthful about information listed on the application for employment. (FMCSR, Sec. 391.23)

## **Drug and Alcohol Test Information from Previous Employers**

Graham Trucking, LLC requires all driver applicants to provide written authorization to the company to obtain drug and alcohol test information for each previous and current employer during the preceding 3 years.

All information from former employers regarding drug and alcohol test results must be in writing and will be retained in a separate file for the driver (if hired). In the event no response is received from a former or current employer, a note stating this will be placed in the file. (FMCSR, Sec. 382.413)

For procedures on hiring of driver applicants who have failed an alcohol or drug test, or have refused to be tested, at a previous employer, see Rush Trucking Corporation's Drug and Alcohol Policy and Procedures (7-2).

Graham Trucking, LLC will not consider for employment any driver applicant who has refused a drug or alcohol test, failed a random, reasonable suspicion, post-accident, return-to-duty, or follow-up alcohol test, or tested positive for controlled substances while with a previous employer. Graham Trucking, LLC has a ZERO tolerance policy for drug and alcohol use.

## **Physical Examination and Certificate**

Graham Trucking requires applicants to be fully qualified physically to perform all duties and functions of driving and the safe operation of a commercial motor vehicle. Pre-Employment Department of Transportation (DOT) physical examinations will be performed by a Certified Medical Examiner listed on the National Registry. (<https://nationalregistry.fmcsa.dot.gov/NRPublicUI/home.seam>).

All drivers are responsible for their medical cards and renewals as those can be taken with driver.

Applicants who successfully pass the physical examination will be issued a Medical Examiner's Certification card. A copy of the Medical Examiner's certification card will be placed in the driver's qualification file, and the original will remain in the possession of



the driver at all times while on duty or operating a company vehicle. (FMCSR, Sec. 391.41, 43, and 45)

Graham Trucking will accept un-expired valid physical cards from driver applicants that are less than 2 years old. The medical examiner must be certified and on the National Registry or the applicant will be required to get a new physical by a certified medical examiner that is on the National Registry. Driver's possessing medical waivers shall also have in their possession medical examiner's certificates for pre employment as well as while they are on duty. All medical card expenses for renewals and recerts will be cost to the driver.

### **Pre-Employment Drug Test**

Graham Trucking, LLC requires all applicants to submit to a DOT pre-employment drug screen to be conducted at a collection site designated by the company. These driver applicants shall not be offered employment until a negative test result has been reported. (See Graham Trucking, LLC's Drug and Alcohol Policy and Procedures.)

### **Road Test and Certificate**

Graham Trucking, LLC requires all driver applicants to successfully complete a road test examination conducted by a Graham Trucking trained official prior to an offer of employment. 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 be approximately 5-10 miles in length, and cover the following areas:

#### **A complete pre-trip inspection**

- Safe coupling and uncoupling procedures of a combination tractor and trailer
- Placing the vehicle in operation
- Using the vehicle's controls and emergency equipment
- Driving in traffic and passing other vehicles (if safely feasible)
- Turning
- Braking, and slowing by means other than braking
- Backing and parking
- Other slow-moving operations

Graham Trucking is required to provide a record of road test examination form on which the driver's skill in each operation listed above is to be rated. The form is to be signed by the company official



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conducting the test. The original of this record will be recorded and placed in the driver's qualification file.

Upon successful completion of the road test examination, the Graham Trucking official who administered the test will complete a certificate of road test. A copy of the certificate will be given to the driver, and the original will be placed in the driver's qualification file. (FMCSR, Sec. 391.31 and 33)

Graham Trucking, LLC will NOT accept a valid Commercial Driver's License from driver applicants in lieu of passing a pre-employment road test.

### **Pre-Employment Screening Report (PSP)**

All PSP reports must reflect a safe driving history. Each report will be examined on an individual basis to determine eligibility for employment.



## **Driver Orientation**

As a condition of employment all newly hired drivers will be required to successfully participate in and complete Graham Trucking's driver orientation program.

### **Orientation Checklist**

- A) Welcome**
- B) Employee Benefit Forms and Benefit Program**
  - 1) Tax forms**
  - 2) Company Driver Benefits**
    - a) Pay**
    - b) Benefits(insurance, vacation, holidays)**
  - 3) Lease Purchase Program**
  - 4) Owner Operator Program**
- C) Safety Manual Overview**
  - 1) Safety Policies**
  - 2) Safety Program**
  - 3) Safety Recognition Program**
  - 4) Accident Procedure**
  - 5) ELD Logging Program/Log Auditing Program**
- D) Operation Overview**
  - 1) Check Calls**
  - 2) Detention**
  - 3) Off Time**
  - 4) Paperwork timeline and Pay Schedule**
- E) Orientation Videos**
- F) Road Test and Vehicle Maintenance Report**



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## **Driver Orientation and Training Policy**

Graham Trucking, LLC is committed to having all drivers new to the organization participate in and successfully complete its driver orientation program. Our goal is to make certain that all new driver associates start their careers at Graham Trucking, LLC with proper training, the right tools and equipment, appropriate driver support systems, and a thorough understanding of company policies and procedures to perform all functions and duties of their job in a safe, legal, and professional manner.

## **Driver Orientation and Training Procedures**

Welcome and thank you for choosing Graham Trucking, LLC for what we hope will be a safe, prosperous, and fulfilling career. The company you choose to drive for is an important and sometimes difficult decision to make. As a driver associate for Graham, we value you as a very important part of our organization. For this reason, we believe your decision to join us was the right one.

We also believe that by working together with honesty, respect, and trust, we can build a long lasting, mutually beneficial, and rewarding relationship.

## **Personal Appearance and Conduct**

All drivers for Graham Trucking, LLC are expected to dress, look, and act like professionals. Maintaining a positive, professional, and safe public image is extremely important to Rush Trucking Corporation. Our drivers are our most visible company representatives to the general public and to our customers, and therefore, need to maintain the highest personal appearance and conduct standards.

Drivers for Graham Trucking, LLC are expected to follow all company policies and procedures, and abide by all customer plant safety rules. Our drivers will be trained in, and expected to obey, all federal and state laws and regulations.

All Graham Trucking, LLC associates are expected to conduct themselves in a professional manner while at work or on duty. Courtesy and mutual respect for others will be demonstrated at all times. All associates are expected to conduct themselves in this manner, and should expect the same treatment in return. Associates who feel they are not being treated in this manner are to contact their immediate supervisor or Human Resources for resolution of their concerns.





Graham Trucking, LLC does not tolerate sexual harassment by any employee, associate, or customer. Any employee who feels they are being subjected to, or are a victim of, any form of sexual harassment has the right to bring the complaint to their immediate supervisor, or to Human Resources, without fear of retaliation.

### **Driver Qualification**

According to Federal Motor Carrier Safety Regulations (FMCSR), Sections 391.25, 27, 43, and 45, the following documents must be renewed on a regular basis: ANNUAL REVIEW OF DRIVING RECORD, CERTIFICATE OF VIOLATIONS, and DOT PHYSICAL EXAM CARD.

Our Safety Department will review these records and be responsible for monitoring compliance. They will notify drivers of upcoming expirations of documents. Upon notification, all drivers will be responsible for immediately updating these records before their expiration dates. Failure to keep these documents current will result in a driver being disqualified from driving a Rush Trucking Corporation vehicle until such time as the record is updated.

All our driver associates will have in their possession while operating a company vehicle, a valid and proper class license issued by the state of their residence. Per FMCSR, a driver whose license has been suspended, canceled, or revoked for any reason must report the incident to the Safety Department within 24 hours of the action. Drivers whose licenses are not valid will not be allowed to operate any company vehicle.

Any Graham Trucking, LLC driver will be disqualified from driving if they violate regulations as listed in Sections 383.51 and 391.15 of the FMCSR. The company will fully comply with these disqualification regulations, and under no circumstances will any exceptions be made.



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## **Controlled Substances and Alcohol Overview**

Graham Trucking, LLC is committed to a drug and alcohol-free environment. Use of alcohol or 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 company premises, engaged in company business, while operating a company vehicle or other equipment, or while operating under the authority of Graham Trucking, LLC is strictly prohibited.

The Federal Highway Administration (FHWA) has issued regulations which require Graham Trucking, LLC to implement a controlled substances testing program.

Graham Trucking, LLC will comply fully with these regulations and is committed to providing all of its employees with a safe and drug free workplace. (See Drug and Alcohol Policy)

## **Customer Service Overview**

Customer service is our product. Graham Trucking, LLC is committed to achieving the highest level of customer satisfaction to ensure our continued success. Our goal is to consistently deliver zero defect customer service.

Our driver associates are expected to pick up and deliver on time, with no cargo loss or damage. Drivers are required to communicate all variances to scheduled pickup and delivery appointments promptly so the company can notify the customer and take any needed corrective action.

All paperwork and billing information is to be accurate, signed, and submitted promptly. Drivers are expected to be courteous, cooperative, and respectful at all times. If a conflict does arise at a customer location, the driver should not attempt to resolve the issue. In such cases the driver's immediate supervisor, or Graham Trucking, LLC customer service representative, should be contacted to handle the situation.

## **Safety Compliance Overview**

All Graham Trucking, LLC driver associates are expected to perform all functions, duties, and assigned work in a safe, legal, and professional manner.



Any incidents of a Graham Trucking, LLC driver being instructed to operate in an unsafe or illegal manner should be reported to the driver's immediate supervisor or the Safety Department.

Graham Trucking, LLC drivers require a high level of skill and alertness to consistently operate their vehicles safely. Drivers who are, or are suspected of being, ill or fatigued will not be permitted to operate a Graham Trucking, LLC vehicle or other equipment until the condition no longer exists or proper rest has been taken.

Transporting of any unauthorized passengers is strictly forbidden in any Graham Trucking, LLC. If any of our drivers are reported, or is found to have an unauthorized passenger, is subject to termination of employment. (See Contraband Policy).

Graham Trucking, LLC driver associates are required to obey posted speed limits on all roads traveled. This policy correlates with our overall expectation that our drivers will operate in a safe, legal, and professional manner. State and Federal regulations, as well as Graham Trucking, LLC, requires the use of seat belts while driving any vehicle. Graham Trucking's seat belt policy is in accord with federal regulations which require the use of seat belts while driving any commercial motor vehicle (FMCSR, Sec. 392.16).

Unauthorized modifications or tampering with any company vehicle or its equipment are strictly prohibited. This includes the unplugging of or tampering of Qualcomm communication systems. Drivers caught tampering with company equipment will be subject to immediate dismissal.

All Graham Trucking, LLC vehicles will be kept neat and clean. It is the responsibility of the assigned driver to maintain the cleanliness and professional appearance of the vehicle.

## **Reporting to Work**

Drivers are expected to have reliable transportation to get to and from their home terminals. Drivers may not use Graham Trucking, LLC vehicles for personal use or for transportation to and from home, unless permission to do so is specifically granted by an authorized Graham Trucking, LLC official.

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## Defensive Driving Policy

Graham Trucking, LLC is strongly committed to a sound and thorough defensive driving policy. While there are no regulatory requirements that mandate the existence of a Defensive driving policy, it makes excellent business sense to have such a policy in place. Underlying the policy is our corporation's strong commitment to safety on the highways.

Drivers who have chargeable accidents will be required to complete post-accident online training that will include specific courses.

While operating company vehicles, drivers should always drive in the safest and most professional manner possible. Likelihood of accidents will be minimized, and a positive image for the company will be promoted in the eyes of the general public. Specifically, our drivers must operate company vehicles in accordance with all provisions of Part 392 - Driving of Motor Vehicles of the Federal Motor Carrier Safety Regulations.

Many factors impact the operation of vehicles on the roadways. They include:

- light levels
- weather
- pavement condition
- traffic conditions
- mechanical condition
- operator condition
- good vision
- alertness
- sound judgment
- Quick reaction time

A successful defensive driver exhibits five main qualities: extensive knowledge, alertness, good judgment, foresight, and driving skill.

The core concepts of defensive driving are:

- Recognizing hazards
- Understanding of evasive and corrective action
- Reaction time



If these principles are followed carefully, the result will be safety on the highways, and a positive image for our company.

## **Defensive Driving Procedures**

### Intersection

Skillful maneuvering through intersections without an accident is a mark of a good defensive driver. Besides the driver's own skill level, intersections also demand anticipation of the actions of other drivers and taking appropriate evasive action.

### Backing

Backing is an extremely hazardous maneuver. If a driver cannot back a commercial vehicle properly they will not be considered for employment with Rush Trucking Corporation.

### Rear Collisions

The primary way to avoid rear collisions is by maintaining a safe and adequate following distance. Drivers must be prepared for possible obstructions on the roadway, either in plain sight or hidden by curves or the crests of hills. Special consideration must be given to night driving, when speeds should be kept to a level that will allow the driver to stop within the distance illuminated by the headlights of the vehicle.

Drivers may risk being struck from behind if they do not maintain an adequate margin of safety in their own following distance. If enough space is not allowed in front of a vehicle, chances go way up that somebody can impact you from the rear.

### Passing

Do not pass unless it is necessary. Failure to pass safely indicates faulty judgment on a driver's part, and failure to consider one or more of the following factors need to be considered:

- is there enough room ahead?
- is there adequate space to move back into your lane of traffic after passing?
- have you signaled your intentions?

## Being Passed

Drivers must be aware of the actions of other drivers, and yield the right of way if another driver begins to sideswipe you or cut you off. A good defensive driver will avoid problems with this kind of accident situation.

## Merging onto 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 preplanning and willingness to yield. Blind spots are not valid excuses for this kind of accident - allowances must be made in areas of limited sight distance.

## Railroad Grade Crossings

Driving across railroad crossings, or in areas where there are rail vehicles of some sort demands special care. Careful observance of the traffic situation is your best defense. Never cross railroad tracks when the signal lights are flashing, or go around lowered gates. If hauling Haz-Mat you must stop no less than 15 feet and no more than 50 feet before crossing. Do not shift gears when crossing railroad tracks.

## Oncoming Traffic

A defensive driver will avoid a collision with an oncoming vehicle at all costs. Even if the vehicle enters your lane of traffic, an accident must be avoided with evasive action.

## Turning

Turning, like passing, is a dangerous maneuver, and demands special care and an observing eye from a defensive driver. Drivers should be aware of other vehicles in their paths, and of the configuration of the turn they are about to undertake, especially when making right hand turns.

## Pedestrians

A sensible defensive driver will always assume that if there is a pedestrian (or small vehicle of some sort) involved, slowing down is the best defense. Be certain to give people and small vehicles the benefit of the doubt.

## Extreme Weather and Road Conditions

Bad weather and other road hazards place special demands upon any defensive driver. The best rule in any kind of bad weather or extreme road condition is get off the road safely and as soon as possible. If the driver must continue, slowing way down and increasing following distance is the best defense, along with increased awareness. Leave early from origin to compensate for bad weather.

A Graham Trucking, LLC expectation that applies to all of the below situations is that drivers are required to contact their immediate supervisor or night dispatch in the event a delay caused by weather or other road conditions will affect pick up or delivery schedules.

## Fog

Graham Trucking, LLC drivers will receive safety training in fundamental fog-driving techniques. Fog reduces drivers' visibility and impairs their distance perception, making it perhaps the most dangerous type of extreme weather conditions.

Because of this, it is Graham Trucking, LLC's policy that, whenever possible, drivers are to avoid driving in foggy conditions by pulling off the road and safely parking until such time as the fog dissipates. If drivers cannot safely pull off the road, the following procedures will be followed:

- Driver should never assume the depth or thickness of any fog. Fog can range from a momentary blurring of the windshield to being several miles thick.
- Drivers should slow the vehicle's speed. Reduction in speed should be done gradually in order to avoid becoming a hazard for other motorists. Determining the correct and safe speed depends on the thickness of the fog and will be left to the individual driver's best judgment.
- Drivers are to use low-beam headlights only when driving in fog. Low-beams serve two purposes. They help our drivers see the immediate roadway and also allow other motorists to see our drivers.
- Drivers shall avoid the use of high-beam headlights while driving in fog. The water particles that make up fog will reflect more light back at the driver than on the roadway when high-beams are used, and will further reduce visibility for the driver.
- Drivers should make use of windshield wipers and the defroster when driving in fog. Driving in foggy conditions will cause a constant fine mist of water on

the vehicle's windshield, reducing visibility in the process. Using the windshield wipers and defroster will alleviate this condition.

- Drivers are to avoid passing other vehicles while driving in fog.
- Drivers are to avoid stopping on any roadway while driving in foggy conditions unless absolutely necessary. If the driver must stop, use the emergency or breakdown lane, activate the emergency flashers, turn off the headlights, and follow Graham Trucking, LLCs breakdown procedures.

#### Road Construction

Graham Trucking, LLC realizes that chances are good that from time to time our drivers will be faced with having to drive on roadways that are being repaired or under construction. Road construction presents several hazards. Because of this, our drivers are expected to approach road construction work zones the same way they would any adverse driving situation and follow these procedures:

- Drivers will be expected to reduce speed and maintain a safe following distance.
- Drivers are expected to drive at or under all special or reduced posted speed limits while traveling through road construction work zones. Safe following distance will be left to the individual driver's best judgment.
- Drivers should be constantly aware of their immediate surroundings, anticipate the possible actions of other motorists, and expect sudden stops.
- Drivers should watch for construction workers or vehicles crossing the roadway.
- Drivers are expected to use the lane furthest from the construction zone when possible.
- Drivers are to avoid sudden lane changes and to use headlights and four-way flashers when traveling through construction zones.

#### Road Hazards

Graham Trucking, LLC 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 re-caps, metal or lumber can cause severe damage to tires, tire rims, electrical systems, and brake lines. Drivers for Graham Trucking, LLC should be aware of the road ahead to identify potential road debris early and take safe and appropriate avoidance maneuvers.



## Underpasses

Hitting a bridge, underpass, or viaduct is a danger our drivers need to be constantly aware of. This type of accident, often referred to as "topping" a trailer, is always preventable. Graham Trucking, LLC drivers need to be aware that the posted height of an underpass is not always accurate. Re-paving and pack snow can reduce the clearance of an overpass. In addition, an empty trailer will ride higher than when it is loaded. Drivers are expected to make thorough trip plans and when in doubt of the clearance of an underpass, to get out of and make a visual inspection or find an alternate route.

## Fixed Objects and Special Intersections

A good defensive driver will observe items in the area around the vehicle which might cause problems. Checking to be certain there is adequate clearance is the primary thing to watch. In the areas of driveways, alleyways or plant 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.

## Physical and Mental Condition

The company expects its drivers to maintain their physical and mental condition. This includes keeping a positive attitude when behind the wheel, and taking good care of their physical health. Fatigue is an especially dangerous factor that drivers must be aware of.

## Following Distance

Tailgating is probably the single most common complaint lodged by the general driving public against truck drivers. Here are some specific following distance guidelines:

- 3-second interval at speeds up to 40 m.p.h.
- 4-second interval at any speed over 44 m.p.h.
- add extra time in bad weather or poor road conditions
- add extra following distance if you are being tailgated.

## Driving Speed

Drive consistent with posted speed limits, with due regard given to existing traffic, weather and highway conditions. Never overdrive your headlights at night. That means you should be able to stop safely in the distance you can see clearly in your headlights.

## Right of Way

A defensive driver should never attempt to exercise the right of way principle. Let the other driver go first. Keep to the right except to pass, or when getting into position for making a left turn. In town, when you enter a main thoroughfare from a side street, alley, driveway or a highway ramp, make a full stop at any crosswalk, then another full stop before actually moving into traffic.

## Meeting Other Vehicles

Keep to the right when meeting other vehicles on a roadway. If a vehicle approaches on your side of the road, slow down and pull to the right as far as you safely can. If you have to take this kind of evasive action, and have actually gone off the highway onto the shoulder, be certain you slow the vehicle down sufficiently before you attempt to come back onto the highway. Never pull to the left to avoid an oncoming vehicle.

When merging onto a highway Graham Trucking, LLC drivers are expected to:

- signal early
  - be patient and watch for an opening
  - build speed and merge smoothly
  - check mirrors constantly
- When exiting a highway Graham Trucking, LLC drivers are expected to:
- signal and change into the right-hand lane early and safely
  - signal intentions to exit early
  - check mirrors constantly
  - reduce speed and exit

## Curves and Turns

The biggest thing to remember in successfully negotiating curves and turns is to slow down. That way you will be able to make any needed adjustments in steering, etc. as required.



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## **Driver Log Policy**

A driver's hours of service are regulated by both federal and state agencies. On the federal level, hours of service of drivers are part of the Federal Motor Carrier Safety Regulations (FMCSR). They are issued and enforced by the Federal Motor Carrier Safety Administration (FMCSA) of the Department of Transportation (DOT).

Graham Trucking, LLC is strongly committed to full compliance with the current federal Hours of Service Regulations, as well as any additional local regulations which may apply. The Hours of Service Regulations are part of the Federal Motor Carrier Safety Regulations, specifically contained in Part 395 of the FMCSR and the Ontario Highway Transportation Act.

Graham Trucking, LLC requires use of electronic log devices that are equipt in the truck within the Qualcomm system for all drivers when available.

Drivers should use only the forms provided by Graham to keep track of their time. Below you will find selected guidelines on what Graham Trucking, LLC expects in completion of the required documents.

## **Federal Requirements - United States**

### **11-hour Driving Rule**

All time spent behind the wheel is considered driving time. After 11 hours of driving time, you must have 10 consecutive hours off duty before you can drive again. The regulations provide two ways a driver may extend his/her driving time:

Adverse Driving Conditions – If you encounter “adverse driving conditions”

such as snow, sleet or fog, or unusual road or traffic conditions on a run that could normally be completed in 11 hours, you are allowed an additional 2 hours of driving to complete the run. However, you must not have known or been able to foresee the situation at the time you began your run. Also, if you are at the 14th consecutive hour after coming on duty, you cannot use this exception. This exception is not and excuse for you to get in 13 hours of driving.

Sleeper Berth – Under the sleeper berth rule you can rest, accumulate off-duty time, make a safe run and still cover the miles in a reasonable time. You can

accumulate your required 10 hours of rest by using the sleeper berth in two periods (and only two) of at least 2 hours each. Therefore, if you spend 2 hours in the sleeper berth during the first period, you must spend 8 consecutive hours there during the second period to meet the 10 hours off-duty requirement.

In calculating your available driving time following your second sleeper berth period, you must be careful. You do not have 11 hours available, but rather 11 hours minus the driving time between the two sleeper berth periods. For example, you spend 4 hours driving between the two sleeper berth periods. Upon completion of the second sleeper berth time you can now drive for only 7 hours. This continues to be true following each sleeper berth period until you have 10 consecutive hours off duty.

The sleeper berth can also be used when accumulating 10 consecutive hours of off-duty time. Sleeper berth time can be combined with any legitimate off-duty time, but, the periods must be consecutive and not broken with and on-duty or driving activities.

#### **14 Consecutive Hours on Duty**

You cannot drive after 14 consecutive hours after coming on duty. You cannot drive again until you have 10 consecutive hours of rest.

Lunch breaks or other off-duty times do not extend the 14-hour period. The 14 hours are consecutive from the time you start your tour of duty.

On-duty time is defined as all time from the time you begin work or are required to be ready for work until you are relieved from work and all responsibility for doing work.

- Waiting to be dispatched
- Inspecting, servicing, or conditioning a commercial motor vehicle
- Driving (at the controls of your vehicle)
- In or on your vehicle (except time spent in the sleeper berth)
- Loading or unloading your vehicle
- Repairing, obtaining assistance, or attending to a disabled vehicle
- Performing any other work for a motor carrier
- Complying with drug or alcohol testing requirements
- Performing compensated work for any other employer



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## **70 Hours of Service Rule**

Graham Trucking operates every day of the week, and therefore running under the 70 hours in 8 days rule. This means that you must not drive after accumulating 70 hours on-duty time in any 8 consecutive days. You may, however, continue to perform non-driving duties after reaching these limits and not be in violation.

## **34-Hour Restart**

The regulations include an optional “restart” provision. This allows you to “restart” your 70 hour clock after having at least 34 consecutive hours off duty.

## **Rest Break**

May drive only if 8 hours or less have passed since end of driver’s last off-duty period of at least 30 minutes.

## **Log Content**

It’s important to remember that the logging requirements do not change depending on whether you are using paper or electronic. The only change is how the data is recorded. Please be certain to log correctly, and ask if there are any questions.

- Completion of the grid and remarks section
- The date
- Starting and ending odometers
- Total miles driving during that 24 hour period
- Truck or tractor and trailer numbers
- Name of the Carrier
- Carrier’s main office address
- Home terminal address
- Driver’s printed name
- Driver’s signature
- Driver’s PIN
- Co-driver’s printed name
- Co-driver’s PIN
- Total hours
- Shipping document numbers

If for some reason your Qualcomm is down or not working and you MUST call the office so that they can equipt you with the correct documentation to be compliant with DOT.



Date: January 22, 2018

To: Graham Trucking LLC Drivers

From: Safety

RE: Policy Update – Progressive Discipline Policy – Log Audit Policy

This is an official update to our “3 strikes” progressive discipline policy and log audit policy. This update will basically streamline the two into one.

1. Performance Improvement Training Assignments (PITA) training video’s will be assigned for all driver responsible violations regardless of point totals.
2. We will now utilize a point system using the severity weight assigned to the specific BASIC Safety Measurement System (SMS) violation. A Major violation may result in an immediate intervention.
3. The driver will continue to receive a print out of any log violations regardless if they receive a formal disciplinary letter from safety.

Phase 1 – 20 + Combined BASIC points – Documented Verbal Warning – Counsel – Performance Improvement Training Assignments (PITA). Points will drop after one year.

Phase 2 – 40 + Combined BASIC points – Written Warning – Fine (\$100) – Mandatory Log Class - Performance Improvement Training Assignments (PITA). Points will drop after one year.

Phase 3 – 60 Combined BASIC points – Final Warning – Fine (\$100) – 2 day suspension - Performance Improvement Training Assignments (PITA). Points will drop after one year.

Phase 4 – Any further serious violations - Termination.

Our goal is educate and coach drivers to avoid future violations. The key for Graham Trucking to be successful is to stop new violations while old violations drop off our record. Progress will be made if we are losing more CSA points that we are receiving from new inspections.

**Hours of Service BASIC** - Examples – Operating a CMV while ill/fatigued – 10 Points / 11 Hour/14 Hour / 70 Hour/30 Minute Break Violation – 7 Points / False report of driver’s record of duty status – 7 Points / General/form and manner – 1 Point / No driver’s record of duty status – 5 Points / Driver failing to retain previous 7 days’ logs – 5 Points / On-board recording device information not available – 1 Point / On-board recording device failure and driver failure to reconstruct duty status – 5 Points / On-board recording device information requirements not met / 5 Points. Not Exhaustive.

**Unsafe Driving BASIC** - Examples – Lane Restriction – 3 Points / Speeding severity ranges from 4 to 10 Points depending on speed severity / Failure to yield – 5 Points / improper turns – 5 Points.. Not Exhaustive. \*Termination due to company policy and or Insurance requirements.



**Driver Fitness BASIC** - Examples – Driving a CMV (CDL) while disqualified – 8 Points / Unqualified driver – 8 Points / Driver lacking physical qualification(s) – 2 Points / Driver operating a CMV without proper endorsements or in violation of restrictions – 8 Points. Not Exhaustive.

**Controlled Substance/Alcohol BASIC** – Examples – Driver uses or is in possession of drugs – 10 Points - \*Termination due to company policy and or Insurance requirements / Possession/use/under influence alcohol-4hrs prior to duty – 5 Points - \*Termination due to company policy and or insurance requirements / Violating OOS order pursuant to section 392.5(a)/(b) – 10 Points - \*Termination due to company policy and or insurance requirements. Not Exhaustive.

**Maintenance BASIC** - Examples - A bit more difficult to rate. This is due to the fact the driver in certain cases should not be held responsible for certain maintenance issues. **Thoughts were to only assign points to the disciplinary total that would be within the driver's control and could have be found in a pre-trip inspection or walk around. Such as.** Inoperative required head lamps – 6 Points / Inoperative turn signal – 6 Points / Stop lamp violations – 6 Points / Brake Hose or Tubing Chafing and or Kinking – 4 Points / Windshield – Obstructed – 1 Point / Tire – flat and/or audible air leak – 8 Points / Windshield wipers inoperative/defective – 1 Point / Horn inoperative/inadequate – 3 Points / No/discharged/unsecured fire extinguisher – 2 Points / No spare fuses as required – 2 Points / Failure to prevent cargo shifting – 1 Point / Leaking/spilling/blowing/falling cargo – 7 Points / No / insufficient warning devices – 2 Points / Wheel/rim cracked or broken – 2 Points / Hood not securely fastened – 2 Points / Mud Flaps missing or defective – 1 Point / Tire – ply or belt material exposed – 8 Points / Flat tire or fabric exposed – 8 Points / Tires (general) – 8 Points / Operating an OOS vehicle – 10 Points / Driver failing to conduct pre-trip inspection – 4 Points. Not Exhaustive.



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## Electronic Logs Device Policy

All drivers are always to implement the ELDs as their logs. It is mandatory for qualification of employment at Graham Trucking, LLC. Here are some tips and things to remember:

**Unassigned Driving:** Classified as driving a CMV without being signed in to the ELD. This is against Company policy. Anytime the CMV is moving, you must be signed in either You are on drive or off duty driving. Each offense gets you one point in the Log audit policy.

1<sup>st</sup> Offense of Excessive Usage: Verbal Warning  
2<sup>nd</sup> Offense: Written Warning  
3<sup>rd</sup> Offense: 2 Day Suspension  
4<sup>th</sup> Offense: Termination

**Personal Conveyance:** Classified as driving off duty for personal reasons. As a company we allow up to 2 hours per day but in the following guidelines:

Used to go from work to home or home to work.

Used to get to a safe haven. \*There must be notes expressing why it is Being used.

Can NOT be used to get to a shipper or receiver or to advance any run.

Each non noted or misused status of personal conveyance will accumulate one Point per occurrence. If there is excessive use, there will be the following Consequences:

1<sup>st</sup> Offense: Verbal Warning  
2<sup>nd</sup> Offense: Written Warning  
3<sup>rd</sup> Offense: Turning off personal conveyance from the ELD

Other helpful tips:

Your sign on and password is your driver code.

On all breaks (30-minute, 10 hours, and 34-hour restart) please take FIVE minutes over. ELDs are computers and they are down to the seconds.

If you move your truck over 5 mph or more than a mile your ELD will automatically go to drive. Be aware and make sure to watch if you are moving around.





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When changing status please make notes each time such as on duty-fueling, on duty-at delivery, etc.

When leaving your truck for your 34-hour restart or dropping it on the yard; make sure you watch your status change to off duty, press ok and watch it change before quickly getting out of truck. Then, completely sign out and become an inactive driver. This will help to not be accidentally changed to on duty if shop must work on the truck or even if the computer glitches.

Please sign below that you have received this addition to the ELD policy and our compliance with DOT laws.

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Signature

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Date



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## **Overview of Safety Program**

All hired drivers are held accountable through Graham's safety programs by the following ways:

### **Mandatory Quarterly Safety Meetings**

All drivers are required to attend all quarterly safety meetings where there is training and overview of safety related topics such as issues/programs, operational topics and recognitions, and a safety related presentation.

### **Monthly Safety/PITA videos**

Each month all employees are assigned videos pertaining to safety related issues (backing, road conditions, HOS, etc). PITA videos are assigned due to violations in logs and inspections.

### **Log Auditing**

All drivers' logs are audited in house monthly. Reports are pulled and accumulate points for violations and is held in a log audit policy. Letter of recognition or a Letter of Violation is sent to each driver for that month and how they did. Electronic logs are monitored daily by dispatch and safety. Drivers are trained and discussed in these instances.

### **Safety Recognition**

Each quarter we recognize drivers for the following:

- Log Excellence
- Driver of the Quarter
- Maintenance Guru's
- Paperwork Champs
- Clean Truck of the Quarter
- Clean Inspection Incentives
- Other awards

### **Infinit-i Safety Videos**

All Graham Trucking employees are required to complete monthly safety videos and pass test connected to them. These videos are part of our safety training program and are assigned each month. You will receive your sign on in orientation.

IF you receive a log book violation, roadside inspection violation, accident, etc you will be assigned Performance Improvement Based training to help with those violations.



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## Safety Video Incentive Program

Infinite-I Video series is what we do to train, broadcast, and make aware of new rules, regulations, and all things safety related. All drivers are required to watch assigned videos monthly. We assign everyone a set of videos monthly and if they receive a violation on the log audit policy and/or a road side inspection they may get additional videos.

Every driver that meets this requirement and scores above 80% on all videos will receive an incentive bonus of \$25.00 each month.

Also, every driver who attains this goal will get one entry into the bi-monthly prize drawing. This drawing will be a large prize that will change each time. A winner will be selected six times a year. Drivers must be present at the safety meeting to be eligible for the drawing.

Thirdly, all 6 winners will get one entry into the Grand Prize that is drawn in December at the annual Christmas party. There are other ways to be awarded an entry into the Grand prize drawing as well.

### The Ultimate Safety Incentive Program

Any driver who received one of the following will receive one entry per category into the Grand Prize Safety drawing that is done at the annual Christmas party.

Categories include:

- Safety Video Bi-Monthly Winners
- No accidents/incidents throughout the year
- Less than 20 points in the log audit policy
- Average 10k miles per month safely OTR/Regional
- Average 95% of loads within year of Local/Short Haul
- Driver of the Quarter any quarter for the year



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## Accident Investigation Policy

Graham Trucking, LLC's policy is to fully investigate all accidents.

The following criteria are cause for immediate dismissal in chargeable accidents:

- Rollover
- At fault and in possession or under the influence of drug or alcohol
- Unauthorized rider in vehicle
- Leaving the scene of an accident without authorization from Rush Trucking personnel
- Cited by Authorities for not having log up to date
- Careless or reckless citation
- Any driver that drops a trailer with the landing gear in the raised position shall be terminated, subject to review for mechanical failure.
- Any driver determined to be at fault for a preventable rear-end collision.

## Driver On Scene Guidelines

- Pull vehicle as far off of the roadway as safely possible
  - Turn on four way flashers
  - Call 911
  - Set out emergency warning devices as required by 49 CFR Sec. 392.22 (b) (1) and in the prescribed positions on the roadway. The FMCSR require that emergency warning devices be set out within ten (10) minutes of stopping.
  - Take note of any fluids leaking or spilling
  - Contact Graham Trucking, LLC Safety at 901-489-1838 or 662-449-8367
  - Be courteous and cooperative with authorities
  - Never admit guilt, liability at the scene of an accident
  - If time allows, write as much information about the accident as possible
  - Never leave the scene of an accident unless there is no one else to make the necessary calls
  - Be prepared to undergo post accident drug and alcohol testing as required Federal Motor
- \*You must call our insurance company to give information over the phone and to help with the investigation.

## Driver Accident History Record Policy

As part of Graham Trucking, LLC's overall commitment to operating in a safe and legal manner, an accident history record will be kept on each driver. These records will be chronological listings of all accidents and incidents involving individual drivers.

The goals of these records are:

- to take a proactive stance in detecting patterns of unsafe driving behavior,
- to take immediate corrective action with all drivers operating in an unsafe manner, or who are involved in accidents or incidents, and
- To recognize those drivers who consistently demonstrate the ability to operate safely and within the regulations.

#### Driver Accident History Record Procedures

The prevention of accidents and incidents is an important part of Graham Trucking's safety program, but when an accident or incident occurs, the company will take appropriate corrective action and document the event. The driver's supervisor, along with Graham Trucking, LLC's Safety Department personnel, will be responsible for keeping the driver accident history record current and up to date by recording all accidents and incidents described below.

#### Accidents

All accidents involving a driver, regardless of preventability or cost, shall be recorded on the driver's accident history record. The company believes the tracking of non-preventable, as well as preventable, accidents can provide valuable information on individual driving behavior and trends. Drivers who show a pattern of 'being in the wrong place at the wrong time' and incurring multiple non-preventable accidents may need additional or remedial defensive driving training.

The cost of the accident shall not be a consideration in whether or not the accident is recorded on the driver's accident history record. Cost is a determinant of accident severity, but the company regards all accidents as serious, regardless of cost. An accident involving \$200 in vehicle damage can easily turn into a \$20,000 accident if a personal injury is claimed. The driver who incurs two or three minor, slow moving accidents is demonstrating a pattern of unsafe or careless driving behavior, and is at higher risk of being involved in a major accident. Accident history records are intended to identify these patterns, and alert the company to take corrective action.

All record of accident entries should include the following minimum information:

- Date and time of the accident.
- Personal injuries involved (if applicable).
- Other vehicle(s) involved (if applicable).
- Property damage involved (if applicable).
- A brief description of the accident.

In addition, a drivers file will include any records of accident counseling, remedial training, or other corrective action taken by the company. This could include things like defensive driving training, slow maneuver operations, backing, etc.

All records of corrective action entries should include the following:

- Type of action taken.
- Date and time of counseling, remedial/additional training, and/or corrective action.
- Signatures of the driver, supervisor, and/or Safety Department representative involved.
- Hours of Service.

Graham Trucking, LLC expects all of its drivers to consistently complete and submit accurate, true, neat, and legible daily logs. Drivers who submit logs with excessive violations are demonstrating unwillingness or inability to meet company standards or comply with federal regulations.

To address this issue, the company has established a Log Policy which provides preventive counseling and remedial training opportunities to improve hours of service performance. The policy also provides a corrective action schedule for drivers who fail to correct their hours of service performance deficits. This corrective action program includes Verbal and Written Warnings to be given to drivers who do not comply with company standards and federal regulations. (See Log Policy)

In addition, the driver's file will include a record of any hours of service counseling, remedial training, or other corrective action taken by the company.

All records of corrective action entries shall include the following:

- Type of action taken.
- Date and time of counseling, remedial/additional training, and/or



corrective action.

- Signatures of the driver, supervisor, and/or Safety Department representative involved.
- Motorist Complaints.

Conveying the image that Graham Trucking, LLC is a safe and responsible organization to our customers and to the general motoring public is critically important. Drivers have the most direct influence on this image, since they are the company's most visible public representatives.

In order to maintain and enhance our company's image, drivers for Graham Trucking, LLC are expected to drive in a defensive manner and exercise road courtesy at all times. Reported road observations that are either phoned in or written, are taken seriously.

A reported negative road observation has an adverse impact on the company's image. Reports of drivers operating in aggressive, careless, or reckless manners shall be investigated. Although these complaints are only alleged, Rush Trucking shall monitor these reports to establish a history of possible poor driving behavior.

Drivers involved in repeated motorist complaints over a span of time are demonstrating a pattern of poor driving behavior contrary to company policy. Such drivers will be subject to the following schedule:

- First motorist complaint: Written notification of complaint.
- Second reported motorist complaint within 3 months of the first: Written Warning and mandatory defensive driving retraining.
- Third reported motorist complaint within 3 months of the second: Final Written Warning and disciplinary action including suspension up to, and including, termination.

A record of all reported motorist complaints shall be entered in the driver's personnel file. All motorist complaints shall include the following information:

- Date, time and location of the observation.



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- QUALCOMM vehicle position history (if equipped)
  - The original letter (if the motorist complaint was in written form).
  - A brief description of driving behavior observed.

Graham Trucking, LLC expects its drivers to operate in a safe, legal, and professional manner at all times. Drivers convicted of moving traffic violations jeopardize their livelihood and the company's safety standards. All drivers for Graham Trucking, LLC are expected to maintain an acceptable driving record. Moving traffic violations include speeding, improper lane changes, driving too fast for conditions, following too close, failure to yield, etc. They do not include parking or equipment violations.





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## Graham Trucking Cell Phone & Texting Policy

Numerous studies have shown that the use of hand-held phones while driving significantly increases the risk of being involved in a crash related incident. According to the National Highway & Traffic Safety Administration (NHTSA), nearly 6,000 people died in crashes involving a distracted driver in 2008. Based on FMCSA guidelines and Rush Trucking (Internal Policy), the only time a driver may exercise the option of using a hand-held device for the purpose of communicating, is when the CMV unit is parked and off of the roadway in a safe place.

Drivers should practice the following steps before and during the operation of a CMV operating under the authority of Graham Trucking:

1. Turn Cell phones off or put on silent before starting the CMV
2. Modify your voice mail to indicate that you are unavailable to answer calls or return messages while driving.
3. Check Call your dispatcher on schedule. By 10am, use QCOM for arrived at, departed from, trailer numbers, etc
4. Call when you stop for a break.
5. If your unit is installed with an EOBR or Qualcomm system, this is the primary and preferred means of communicating. You must be parked to use this equipment.
6. Per the regulation, the hands free device must be separate from the cell phone unit, such as a Bluetooth device. Do not depend on the hands free speaker on the cell phone.
7. When you receive a call from Graham, find a safe place to park and return the call within fifteen (15) minutes of the inbound call.

Graham Trucking is committed to and concerned about the safety of its drivers as well as the general public. It is the goal of our company to lead by example in hope that others will follow our lead by also not using a hand held device during the operation of any motor vehicle. For this reason, Graham Trucking, LLLC will not tolerate any violation of the above policy. Violations of this policy WILL result in automatic termination if violated for talking on the HANDSET while driving or texting.



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## BACKING SAFELY

### G.O.A.L. (GET OUT AND LOOK)

Effective immediately, Graham Trucking has decided to institute a new backing policy based on the rising frequency of recent backing incidents/accidents.

We will refer to this program as “G.O.A.L.” which means GET OUT AND LOOK, before backing. One out of every four accidents is the result of poor backing techniques. Poor backing can result in damage to equipment, buildings, property, and pedestrians, and can cause serious injury and death. Skill is required to be a safe driver. Professional drivers know the daily challenge of avoiding collisions with fixed objects while backing. Although a driver’s ability to see toward the rear is limited, this handicap can be overcome through the use of extra care and caution.

Backing accidents are almost always preventable if the driver is properly trained and uses the following skills:

- o If you must back up, look, think and plan ahead
- o Avoid backing if at all possible, or pick spots that reduce backing to a minimum
- o Walk around your rig and check for clearance – GET OUT AND LOOK!!
- o Make sure your trailer doors are properly hooked
- o Watch for people, vehicles, forklifts, overhead wires, tree limbs & other objects
- o Use your mirrors and back up slowly using the driver’s side whenever possible
- o Watch your clearance on both sides through your side mirrors
- o Use a spotter if the backing maneuver could be hazardous
- o Turn on your four-way flashers before backing
- o Tap your horn periodically as a warning
- o If it is dark, get out and check the unlighted areas with a flashlight



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## **Maintenance Program**

At Graham Trucking we pride in how well our equipment is taken care of. We have a full shop that is very hands on in all aspects. If there are any problems with a truck or trailer we will find our mechanics to fix it or get us to the right direction.

All company drivers and lease purchase drivers equipment will be underneath the umbrella of Graham's maintenance program. As one of those drivers you must keep dispatch and the shop aware of all needed work and any breakdowns.

If you are broke down or have an issue out on the road the policy is to call dispatch and they will lead you in the right direction.

Inner office preventative maintenance is done at the following benchmarks:

A Service: grease, check oils and fluids, look over the truck for damaged parts, lights, etc. These are done between 12500 and 26000 miles depending on the truck

B Service: grease, change oil and filters, check the transmission, check rearends and any damage, lights, etc. These are done between 25000 and 40000 miles depending on the motor.

On trailers, the preventative maintenance is done every 90 days. This will intell greasing, brakes being adjusted, tires, lights, and any broken parts.

Annual inspections are done yearly on all trucks and every 90 days on the trailers.

Owner Operators are responsible for all their own maintenance. They must turn in a monthly maintenance sheet along with receipts by the 5th of the following month. All owner operator trucks must undergo a 30 day inspection by the office in order to be compliant.

## **Annual Vehicle Inspection Policy**

Graham Trucking is committed to following an annual commercial vehicle inspection program. Department of Transportation (DOT) regulations require commercial motor vehicles to undergo a thorough inspection at least annually. All equipment items not meeting the minimum standards must be repaired before the vehicle is put back into service. Our annual inspection procedure will help avoid DOT penalties and provide support for a sound inspection and maintenance program.

## **Annual Vehicle Inspection Procedure**

All vehicles subject to Graham Trucking, LLC's control must be inspected at least annually. This includes each vehicle in a combination. For example, for a tractor semi-trailer, full trailer combination, the tractor, semi-trailer, and the full trailer (including the converter dolly) must each be inspected.

### **Inspector qualifications**

Only inspectors qualified under Sec. 396.19 of the FMCSR are allowed to perform an annual inspection.

### **Vehicle inspection criteria**

The components that are to be inspected are listed in Appendix G to the Federal Motor Carrier Safety Regulations (found in the back of the green Pocketbook).

They include:

- brake system
- coupling devices
- exhaust system
- fuel system
- lighting devices
- safe loading
- steering column
- suspension
- frame
- tires
- wheels and rims
- windshield glazing
- windshield wipers.

Each of these major component areas has subsidiary components that are required to be inspected as part of the annual vehicle inspection.

Any equipment items not meeting minimum standards must be repaired before the vehicle can be put back in service.



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## Annual inspection documentation

The qualified inspector performing the inspection must prepare a report which includes the following information:

- the inspector's name
- the name of the motor carrier operating the vehicle
- the date of the inspection
- vehicle identification
- a list of the components inspected and designation of any components not meeting inspection standards
- certification that the inspection is accurate, complete, and complies with the regulations.

The original or a copy of the annual vehicle inspection report will be retained at the office of Graham Trucking. The inspection report will be retained for 14 months. Owner's of vehicles who are leased to Graham Trucking are required to submit updated Annual Inspection Reports to the office within 7 workdays following the completion of its yearly inspection.

## Documentation on vehicle

A copy of the annual inspection report or decal must be carried on the vehicle.

## Fueling & Tolls

Fuel at Love's as we have a fuel discount program  
Fleetone Cards

As much as possible, direct fuel related questions to the dispatch office.

The total daily limit for purchases is \$800/day.

This limit is based on a calendar day, midnight to midnight, even though the system may not update exactly at midnight.

The limit includes \$25/day for additives

- DEF purchases fall under the "additives," and are subject to the \$25/day limit.
- Other "additives" include oil, anti-gel, wiper fluid

Receipts are required for any Fleetone purchases. If fuel is purchased with any other form of payment, a receipt is required to be submitted to Graham. (Fleet drivers and Owner/Operators - the truck owner determines their need for receipts)



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## Tolls

Graham Trucking Drivers may possibly go into areas where they would need to go through tolls. You must make sure you have appropriate funds to get through them. If you run a toll, they send us the toll cost plus a fee and those fees are placed back on the driver.

The rule of thumb is if you can get around a toll in your route, go around if it doesn't add extra mileage to your trip. Majority of the areas we haul will not meet the criteria to have to go through a toll. If you are in TX, please route yourself around the tolls as there will be no extra mileage to your trips in doing this.



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## **Payroll Policies**

1. Graham Trucking's pay week runs from Sunday at 12:00 a.m. to Saturday at 11:59 p.m. This means any runs that you complete within this time frame will be paid during the above week's pay period. If you are in the middle of a trip or have not delivered yet it will be added to the following week or upon delivery.
2. After each trip you must send in all your paperwork associated with that pro number. All paperwork must be received no later than the following Monday after the pay period ends in order to guarantee your settlement is processed.
3. There is a one-week holdback. You will receive your first settlement check on the send Friday after your first run.
4. Graham Trucking pays you by the delivery date of your load as it falls in the pay period. If you write an incorrect date on your pay sheet or scan cover page and our system shows another date, we will be using our system date. If you are not in agreement with this date you must contact your Driver Manager. We in payroll cannot change data in the system as it relates to dispatch. Any changes in pay must be approved by an Operations Manager, only they can authorize us to override a trip. So without speaking to a manager, please do not ask Payroll to make changes.
5. All checks are direct deposited on Friday. If you have a change in your address, or how you want to receive your checks please notify us immediately. Check stubs will be in the mailbox after 1700 on Friday.

## **Trip Cover Sheets**

1. Please complete all empty spaces. Sometimes, there are questions involving one of your trips which can be easily answered if you filled it out properly.
2. These are your pay sheets; make sure they are done correctly. All drivers must have a trip sheet in order to finalize payroll.
3. A bill of lading must accompany each pro number listed on your trip envelope. Each bill of lading you turn in must have a (POD) proof of delivery. Proof of delivery can be a signature or a stamp by the facility you are delivering to, must be legible.
4. Paperwork can be turned in numerous times a week up to once a week inside the office. If it is after hours, paperwork can be placed in the mailbox. Make sure it is secured so to not get mixed with anyone else's.

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## **Hazardous Materials Policy**

Graham Trucking, LLC's policy is to comply fully with all federal Hazardous Materials Regulations as found in 49 CFR Parts 106 through 180, and in FMCSR Part 397, regarding the handling and transportation of hazardous materials. We believe that compliance and safety begin with the driver. Therefore, Graham Trucking is committed to providing all driver associates with proper and complete hazardous materials training. All drivers are expected to have a thorough understanding of, and follow, the company's hazardous materials procedures.

## **Hazardous Materials Procedures**

Graham Trucking, LLC's hazardous materials procedures have been developed to ensure the safety of drivers, customers, and the motoring public; to minimize the risks associated with hazardous materials handling; and to avoid fines and penalties for noncompliance. All driver associates will be trained in safe and proper handling and transporting of hazardous materials.

## **At the Shipper**

Graham Trucking, LLC drivers are expected to check each hazardous materials shipment for proper shipping papers, labels, markings, and placards (if applicable). Even though these items are requirements assigned to the shipper, the driver is responsible for checking, accepting and signing for all hazardous materials shipments.

A Graham driver should not accept or sign for any hazardous materials shipment unless it is in complete compliance with the Hazardous Materials Regulations governing such shipments.

## **Shipping Papers**

Most hazardous materials shipments must be accompanied by proper shipping papers. The shipper is responsible for providing the shipping papers, but Graham Trucking, LLC drivers are responsible for making certain that shipping papers are complete, accurate, and appropriate for shipment, before accepting or signing for any hazardous materials shipment.

Shipping papers must contain the following information:

- The proper shipping description of the material(s) in question, including proper shipping name, hazardous class, identification (ID) number, packing group (if required), and total quantity of the shipment.
- Emergency response telephone number.



- All pages of the shipping paper must be numbered as 1 of 3, 2 of 3, 3 of 3, etc., if multiple pages are involved in the document.
- All shipping papers for hazardous materials shipments handled by Graham Trucking, LLC must have a signed shipper's certification, with the signature of an authorized shipper's employee.
- All hazardous materials included on the same shipping paper with nonhazardous items will be listed first, be in color (usually red) which is not the color of the non-hazardous entries or have an X or RQ (regulated quantity) in a column designed HM (hazardous materials). Graham Trucking drivers must not accept or sign for any hazardous materials shipment discrepancies, inaccuracies, or incomplete entries are found on the shipping papers.
- All shipping papers will be maintained on file at Graham Trucking's office.

### **Labels**

The shipper is responsible for determining the need for and application of all required primary and (if necessary) secondary labels to packaging containing hazardous materials. These labels provide critical information about package content and warn of potential hazards associated with the materials contained. Labels are to be placed on the same surface as the proper shipping name marking and must be placed on a surface contrasting color to the label. An alternative is for the label to have dotted or solid line outer border.

Graham Trucking, LLC's drivers will make certain that all hazardous material labels match the hazard class(es) or divisions entered on the shipping papers and will only accept those packages that are properly labeled.

Graham Trucking, LLC's drivers will not accept packages if labels are missing, applied improperly, obscure, torn, unreadable, or otherwise defective.

### **Marking**

The shipper is responsible for properly marking all non-bulk and bulk packages. Graham Trucking, LLC drivers are required to check all package markings for compliance. Most non-bulk packages must be marked with the proper shipping name, ID number, and consignors or destination's name and address. The hazardous materials regulations (HMR) defines non-bulk packaging as packaging which has:

- A maximum capacity of 450 L (119 gallons) or less, as a receptacle for a liquid.
- A maximum net mass of 400 kg (882 pounds) or less, and a maximum of 450 L (119 gallons) or less as a receptacle for a solid.
- A water capacity of 454 kg (1000 pounds), as a receptacle for a gas.



Additional markings may be required for non-bulk and bulk shipments, depending on the type of hazardous and type of packaging. Drivers shall refuse any shipment if it is improperly marked.

### **Placards**

The shipper must provide the driver with any required placards for the hazardous materials indicated on the shipping papers, unless the vehicle is already placarded correctly. Graham Trucking, LLC drivers will refuse any shipment or load in which the correct number and type of placards is not provided by the shipper when required.

Once received, Graham Trucking, LLC drivers are to place placards on the vehicle: one on each side, one on the back, and one on the front (ref. HMR, sec. 172.504). The driver will maintain the integrity of the placards during all phases of transportation. At no time will a driver transport a hazardous material requiring placards without proper placards being affixed to the motor vehicle.

### **Loading/Unloading Instructions**

Before doing any loading or unloading, the driver should secure the vehicle from moving. Only after a driver is satisfied that the vehicle is safe from moving should loading or unloading be allowed to begin.

Graham Trucking, LLC drivers will make certain the shipment is secured to prevent shifting and cargo movement during transit.

Smoking on or near a vehicle while loading/unloading is forbidden. Do not park within 300 feet of an open flame (includes matched) or smoke within 25 feet of a vehicle containing hazardous material.

After loading and before transport begins, Graham Trucking, LLC drivers will make certain the shipment is secured to prevent shifting and cargo movement during transit and is within legal weight limits.

Drivers will not unload or allow the unloading process to begin until the consignee or destination representative has accepted and signed for the shipment.

### **Accidents and Incidents**

Graham Trucking, LLC drivers must report all accidents and incidents as soon as possible after they occur. With the added health and environment risks associated with transporting hazardous materials, this requirement becomes even more important.

The company has developed procedures for accidents and incidents involving hazardous materials. Purpose of these procedures is to minimize risk to the driver's personal safety, the health and safety of



the general public, and the environment. All Graham Trucking, LLC Drivers, dispatch personnel, management are expected to know and follow these procedures.

If an accident or incident involving hazardous materials occurs, the following procedures are to be implemented by the driver:

- Secure the scene. Keep people away from the accident and/or spill.
- Do not touch or walk into or through any spilled materials.
- Avoid inhalations of all gasses, fumes, and smoke. (remember that some gasses are odorless and colorless. Do not assume fumes are not present simply because no odor or visible cloud is present.)
- Consult the Emergency Response Information provided with the shipment or the Emergency Response Guide and follow the guidelines.
- Contact the local police and/or fire department, and Emergency Response Authorities immediately at 911.
- Call the emergency response telephone number provided on the shipping papers for additional guidance, if the spill is significant enough to impact public or property.
- Report the accident/incident to your dispatcher and the safety department immediately.
- Stay with the vehicle and assist in the cleanup procedures.
- Complete a company accident report and submit it to the Safety Department in person or by facsimile at (662) 449-8367

#### **Dispatch Operations**

- After receiving the accident/incident report from the driver and assessing the situation, dispatch operations will provide any necessary immediate guidance, and contact the Safety Department per ISO instructions.

#### **Safety Department**

- After initial notification by the driver or dispatch operations, the Safety Department is responsible for the coordination of all aspects of the accident/incident response.
- The Safety Department establishes contact with the driver and any official at the scene. If possible, the Safety Department will send a representative to the scene.
- The Safety Department will comply with and fulfill any requirements placed on Graham Trucking, LLC by law enforcement officials.
- After verification that all the above items have been completed, the safety department will do all required notifications and required reports.



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## **Drug and Alcohol Policy**

Graham trucking, LLC is dedicated to the health and safety of our drivers. Drugs and/or alcohol use poses a serious threat to driver health and safety. Therefore, it is the policy of Graham Trucking, LLC to prevent the use of drugs and abuse of alcohol from having an adverse effect on our drivers.

The federal government has recognized the serious impact of drug use and alcohol abuse. The Federal Motor Carrier Safety Administration (FMCSA) has issued regulations, which require all motor carriers 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 use of controlled substances by drivers of commercial motor vehicles.

Graham Trucking, LLC will comply with these regulations and is committed to maintaining a drug-free workplace.

It is the policy of Graham Trucking, LLC that the use, sale, purchase, transfer, possession, or presence in one's system of alcohol or any controlled substance (except medically prescribed drugs) by any person while on the company premises, engaged in company business, operating company equipment, or while under the authority of Graham Trucking, LLC is strictly prohibited. Disciplinary action will be taken as necessary.

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. This policy is effective January 1, 2000, and will supersede all prior policies and statements relating to alcohol or drugs.



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## Drugs 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 (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 Federal Motor Carrier Safety Regulations (FMCSR) and what company procedure is.

### Who is Responsible?

- It is the company's responsibility to provide testing for the driver that is in compliance with all federal and state laws and regulations, within the provisions of this policy. The company will retain all the records related to testing and the testing process in a secure and confidential matter. Rush Trucking Corporation's alcohol and drug program administrator who is designated to monitor, facilitate, and answer questions pertaining to these procedures is located at:

Graham Trucking, LLC  
920 Old Hwy 51  
Nesbit, MS 38651

- The driver is responsible for complying with the requirements set forth in this policy. The driver will not use, have possession of, abuse, or have the presence of alcohol or any controlled substance in excess of established threshold levels while on duty. The driver will not use alcohol when preparing to perform a 'safety sensitive' function, or immediately after performing a 'safety sensitive' function.

### Definitions

When implementing and interpreting the drug and alcohol policies and procedures required by the FMCSA as well as the policies and procedures required by the company, the following definitions apply:

- Alcohol means the intoxication agent in beverage alcohol, ethyl alcohol, or other molecular weight alcohols including methyl and isopropyl alcohol.
- Alcohol concentration (or content) means the alcohol in a volume of breath expressed in terms of grams of alcohol per 210 liters of breath as indicated by an evidential breath test.

- Alcohol use means the consumption of any beverage, mixture, or preparation, including any medication, containing alcohol.
- Breath Alcohol Technician (or BAT). An individual who instructs and assists individuals in the alcohol testing process and operates an evidential breath testing device (EBT).
- CFR means Code of Federal Regulations.
- Collection site. A place designed by the company, where individuals present themselves for the purpose of providing a specimen of their urine to be analyzed for the presence of drugs.
- Commercial motor vehicle means a motor vehicle or combination or motor vehicles used in commerce to transport passengers or property if the motor vehicle:
  - Has a gross combination weight rating of 26,001 or more pounds (11,794 kilograms) inclusive of a towed unit with a gross vehicle weight rating of more than 10,000 pounds (4536 kilograms): or
    - Is designed to transport 16 or more passengers, including the driver; or
    - Is of any size and is used in the transportation of materials found to be hazardous for the purposes of the Hazardous Materials Transportation Act and which require the motor vehicle to be placarded under the Hazardous Materials Regulations (49 CFR part 172, subpart F).

Consortium means an entity, including a group or association of employers or contractors, that provides alcohol or controlled substances testing as required by this part, or other DOT alcohol or controlled substances testing rules, and that acts on behalf of the employers.

Controlled substance has the meaning assigned by 21 U.S.C. 802 and includes all substances listed on Schedules I through V and any subsequent revisions to the list. The list can be found in 21 CFR 1308. In accordance with FHWA rules, urinalyses will be conducted to detect the presence of the following substances:

- Marijuana
- Cocaine
- Opiates
- Amphetamines
- Phencyclidine (PCP)

Detection levels requiring a determination of a positive result shall be in accordance with the guidelines adopted by the FMCSR in accordance with the requirements established in 49 CFR, Section 40.29 (e)(f).

- Disabling damage means damage which precludes departure of a motor vehicle from the scene of the accident in its usual manner in daylight after simple repairs. o Inclusions
- Damage to motor vehicles that could have been driven, but would have been further damaged if so driven. o Inclusions

- Damage which can be remediated temporarily at the scene of the accident without special tools or parts.
- Tire disablement without other damage even if no spare tire is available.
- Headlight or taillight damage.
- Damage to turn signals, horn, or windshield wipers which make them inoperative.

Driver means any person who operates a commercial motor vehicle. This includes, but is not limited to: full time, regularly employed drivers; casual, intermittent or occasional drivers; leased drivers and independent, owner operator contractors who are either directly employed by or under lease to an employer or who operates a commercial motor vehicle at the direction of or with the consent of an employer.

Drug means any substance (other than alcohol) that is a controlled substance as defined in this policy and 49 CFR Part 40.

EBT (or evidential breath testing device). An EBT approved by the National Highway Traffic Safety Administration (NHTSA) for the evidential testing of breath and placed on NHTSA's 'conforming products list of evidential breath measurement devices' (CPL), and identified on the CPL as conforming with the model specifications available from the National Highway Traffic Safety Administration, Office of Alcohol and State Programs.

FMCSA means Federal Motor Carrier Safety Administration, U.S. Department of Transportation.

Licensed medical practitioner means a person who is licensed, certified, and/or registered, in accordance with the applicable federal, state, local, or foreign laws and regulations, to prescribe controlled substances and other drugs.

Medical Review Officer (MRO). A licensed physician (medical doctor or doctor of osteopathy) responsible for receiving laboratory results generated by an employer's drug testing program who has knowledge of substance abuse disorders and has appropriate medical training to interpret and evaluate an individual's confirmed positive test result together with his or her medical history and any other relevant biomedical information.

Performing (a safety-sensitive function) means a driver is considered to be performing a safety-sensitive function during any period in which he or she is actually performing, ready to perform, or immediately available to perform any safety sensitive functions.

Prescription Medications means the use (by a driver) of legally prescribed medications issued by a licensed health care professional familiar with the driver's work related responsibilities.

Refuse to submit (to an alcohol or controlled substances test) means that a driver:

- Fails to provide adequate breath for alcohol testing as required by part 40 of this title, without a valid medical explanation, after he or she has received notice of the requirement for breath testing in accordance with the provisions of this part.
- Fails to provide an adequate urine sample for controlled substances testing as required by part 40 of this title, without genuine inability to provide a specimen (as determined by a medical evaluation), after he or she has received notice of the requirement for urine testing in accordance with the provisions of this part.
- Engages in conduct that clearly obstructs the testing process.
- Safety-sensitive function means all time from the time a driver begins to work or is required to be in readiness to work until the time he/she is relieved from work and all responsibility for performing work.

Safety-sensitive functions shall include:

1. All time at an employer or shipper plant, terminal, facility, or other property, or on any public property, waiting to be dispatched, unless the driver has been relieved from duty by the employer;
  2. All time inspecting equipment as required by Secs. 392.7 and 392.8 of this subchapter or otherwise inspecting, servicing, or conditioning any commercial motor vehicle at any time;
  3. All time spent at the driving controls of a commercial motor vehicle in operation;
  4. All time, other than driving time, in or upon any commercial motor vehicle, except time spent resting in a sleeper berth (a berth conforming to the requirements of Sec. 393.76 of this subchapter);
  5. All the time loading or unloading a vehicle, supervising, or assisting in the loading or unloading, attending a vehicle being loaded or unloaded, remaining in readiness to operate the vehicle, or in giving or receiving receipts for shipments loaded or unloaded; and
  6. All time repairing, obtaining assistance, or remaining in attendance upon a disabled vehicle.
- Screening test (also known as initial test) in alcohol testing, it means an analytical procedure to determine whether a driver may have a prohibited concentration of alcohol in his or her system. In controlled substance testing, it means an immunoassay screen to eliminate "negative" urine specimens from further consideration.
  - Substance abuse professional. A licensed physician (Medical Doctor or Doctor of osteopathy); or a licensed or certified psychologist, social worker, or employee assistance professional; or an addiction counselor (certified by the National Association of Alcoholism and Drug Abuse Counselors Certification Commission or by the International Certification Reciprocity



Consortium/Alcohol & Other Drug Abuse). All must have knowledge of and clinical experience in the diagnosis and treatment of alcohol and controlled substances-related disorders.

### **Alcohol Prohibitions**

FMCSR (Part 382, Subpart B) prohibits any alcohol misuse that could affect performance of a safety-sensitive function.

This alcohol prohibition included:

- Use while performing safety-sensitive functions
- Use during the 4 hours before performing safety-sensitive functions
- Reporting for duty or remaining on duty to perform safety-sensitive functions with an alcohol concentration of 0.004 or greater
- Use of alcohol for up to 8 hours following an accident or until the driver undergoes a post-accident test
- Refusal to take a required test.

NOTE: Per FMCSR, 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 for at least 24 hours.

### **Drug Prohibitions**

The regulations (Part 382, Subpart B) prohibit any drug use that could affect the performance of safety-sensitive functions, including:

- Use of any drug, except when administered to a driver by, or under the instruction of, a licensed medical practitioner, who has advised the driver that the substance will not affect the driver's ability to safely operate a commercial motor vehicle. (The use of marijuana under California Proposition 215 or the use of any Schedule I drug under Arizona Proposition 200 is not a legitimate medical explanation. Under federal law, the use of marijuana or any Schedule I drug does not have a legitimate medical use in the United States.)
- Testing positive for drugs
- Refusing to take a required test.

### **Condition for Employment**

A driver application, who has refused a drug or alcohol test, failed a random, reasonable suspicion, post-accident, returns to duty, follows up alcohol test, or tested positive for controlled substances will not be



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considered for employment with Graham Trucking, LLC. Graham Trucking, LLC has a ZERO tolerance policy for drug and alcohol use.

### **Circumstances for Testing**

Pre-Employment Testing (Sec. 382.301): All driver applicants will be required to submit to and pass a urine drug test as a condition of employment.

Driver applicant drug testing shall follow the collection, chain-of-custody, and reporting procedures set forth in 49 CFR Part 40.

A driver who tests positive for controlled substances will not be considered for a driving position, or safety-sensitive function, for a period of 2 years following a positive test.

Reasonable Suspicion Testing (Sec. 382.307): If a company official designated and trained under FMCSRs (Sec. 382.603) believes a driver is under the influence of alcohol or drugs, the driver will be required to undergo a breath test and/or urinalysis.

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

The driver's supervisor or another company official will immediately remove the driver from any and all safety-sensitive functions and take the driver or make arrangements for the driver to be taken to a testing facility.

The person who makes the determination that reasonable suspicion exists to conduct an alcohol test may not administer the alcohol test.

Per FMCSRs, reasonable suspicion alcohol testing is only authorized if the observations are made during, just preceding, or after the driver is performing a safety sensitive function.

**UNDER NO CIRCUMSTANCES SHALL A DRIVER BEING TESTED FOR ALCOHOL OR A CONTROLLED SUBSTANCE, BASED UPON REASONABLE SUSPICION, TRANSPORTS THEMSELVES TO A TESTING FACILITY.**

Per FMCSRs, 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 for at least 72 hours.



If an alcohol test is not administered within two hours following a reasonable suspicion determination, the program administrator will prepare and maintain a record stating the reasons why the test was not administered within 2 hours.

If the test was not administered within 8 hours after a reasonable suspicion determination, all attempts to administer the test shall cease. A record of why the test was not administered must be prepared and maintained.

A written record of the observation leading to a controlled substance reasonable suspicion test, signed by the supervisor or company official who made the observation will be completed within 24 hours of the observed behavior or before the results of the controlled substances test are released, whichever is first.

A driver awaiting the results of a reasonable suspicion drug test will be suspended from driving or acting in a safety-sensitive position, until test results are obtained from the testing facility.

Post-Accident Testing (Sec. 382.303): Drivers are to notify the Operations Department and the Safety Department as soon as possible if they are involved in an accident.

According to FMCSA regulations (Sec. 382.303), if the accident involved:

- A fatality, bodily injury with immediate medical treatment away from the scene and the driver received a citation or disabling damage to any motor vehicle requiring to away and the driver received a citation; then the driver will be tested for drugs and alcohol as soon as possible following the accident. The driver must remain readily available for testing. If the driver isn't 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 8 hours or until testing is completed.

If the alcohol test is not administered within two hours following the accident the Safety Department will prepare a report and maintain a record, stating why the test was not administered within two hours. If the alcohol test is not administered within eight hours following the accident, all attempts to administer the test will cease. A report and record of why the test was not administered will be prepared and maintained.

The drug test must be administered within 32 hours of the accident. If the test could not be administered within 32 hours, all attempts to test the driver will cease.

The Safety Department will prepare and maintain a record stating the reasons why the test was not administered within the allotted time frame.



Graham Trucking, LLC shall provide drivers with necessary post-accident information, procedures and instructions, prior to the driver operating a commercial motor vehicle, so that drivers will be able to comply with FMCSR, Section 382.303-Post accident drug/alcohol testing.

Random Testing (Sec. 382.305): Rush Trucking Corporation will conduct random testing for all driver as follows:

- Graham Trucking, LLC will use a consortium. The consortium will use a selection process based on a scientifically valid method, prescribed by FHWA regulations.
- The consortium will administer the random testing program, maintaining all pertinent records on random tests administered.

At least 10 percent of the company's average number of driver's positions will be tested for alcohol each year. At least 50 percent of the company's average number of drivers' positions will be tested for drugs each year.

The random testing will be spread reasonably throughout the calendar year. All random alcohol and drug tests will be unannounced, with each driver having an equal chance of being tested each time selections are made.

A driver may only be randomly tested for alcohol while he/she is performing a safety-sensitive function, just before performing a safety-sensitive function, or just after completing a safety-sensitive function.

#### **DOT Interpretations ---- 382.305 # 17**

Part 382 does not prohibit an employer from notifying a driver of his/her selection for a random controlled substances test while the driver is in an off-duty status. If an employer selects a driver for a random controlled substances test while the driver is in an off-duty status, and then chooses to notify the driver that he/she has been selected while the driver is still off-duty, the employer must ensure that the driver proceeds immediately to a collection site.

Once notified that he/she has been randomly selected for testing, the driver must proceed immediately to the specified collection site.

Operations Managers and Terminal Managers shall ensure that the drivers selected for random tests contact the Drug and Alcohol Administrator. Under no circumstances shall Operations Managers or Terminal Managers wait more than 10 days to inform the selected drivers to contact the Drug and Alcohol Administrator.

Confidentiality of the selected drivers is essential and strictly monitored.



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## **Refusal to Submit**

According to FMCSR 49 CFR Sec. 382.211, a driver may not refuse to submit to a post-accident, random, reasonable suspicion, or follow-up alcohol or controlled substances test 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 adequate breath or urine sample for alcohol or drug testing and any conduct that obstructs the testing process. This includes adulteration or tampering with a urine or breath sample.

## **Alcohol Testing Procedures**

Alcohol testing will be conducted at the nearest approved collection facility by a qualified breath alcohol technician (BAT), according to 49 CFR Part 40 Subpart C procedures. Only products on the conforming products list (approved by the National Highway Traffic Safety Administration (NATSA)) will be utilized for testing under this policy.

The testing will be performed in a private setting. Only authorized personnel will have access and are the only individuals who can see or hear the test results.

When the driver arrives at the testing site, the breath alcohol technician (BAT) will ask for identification. The driver may ask the technician for identification.

The BAT will then explain the testing procedure to the driver. The BAT may only supervise one test at a time and may not leave the testing site while the test is in progress.

A screening test is performed first. The mouthpiece of the evidential breath testing device (EBT) used in the test must be sealed before use and opened in the driver's presence.

The driver must blow forcefully into the mouthpiece of the testing device for at least 6 seconds or until an adequate amount of breath has been obtained.

Once the test is completed, the BAT must show the driver the results. The results may be printed on a form generated by the EBT or may be displayed on the EBT. If the EBT does not print results and test information, the BAT is to record the displayed result, test number, testing device, serial number of the testing device, and time on the breath alcohol testing form. If the EBT prints results, but not directly onto the form, the BAT must affix the printout to the breath alcohol testing form in the designated space.



If the reading is 0.02 or more, a confirmation test must be performed. An EBT must be used for all confirmation tests.

The test must be performed after 15 minutes have elapsed, but within 30 minutes of the first test. The BAT will ask the driver not to eat, drink, belch, or put anything into his/her mouth. These steps are intended to prevent the buildup of mouth alcohol, which could lead to an artificially high result.

A new, sealed mouthpiece must be used for the new test. The calibration of the EBT must be checked. All of this must be done in the driver's presence.

If the results of the confirmation test and screening test are not the same the confirmation test will be used.

Refusal to complete and sign the testing form or refusal to provide breath will be considered a failed test, and the driver will be removed from all safety-sensitive functions until the matter is resolved.

Results: According to FMCSRs, the BAT will transmit all results to the employer in a confidential manner. The results will be transmitted via written documentation, telephone, or fax, and must be done in a timely fashion so Graham Trucking, LLC can prevent the driver who fails an alcohol test from performing any safety-sensitive functions.

If the initial transmission is not in writing, the BAT must send a copy of the driver's breath alcohol testing for as soon as possible.

### **Drug Testing Procedures**

Drug testing will be conducted at the nearest approved collection facility. Specimen collection will be conducted in accordance with 49 CFR Part 40, Subpart B, and any applicable state law. The collection procedures have been designed to ensure the security and integrity of the specimen provided by each driver. The procedures will strictly follow federal chain of custody guidelines.

A drug testing custody and control form will be used to document the chain of custody from the time the specimen is collected at the testing facility until it is tested at the laboratory.

As well as the use of a custody and control form, test preparation includes:

- Use of a clean, single use specimen bottle that is securely wrapped until filled with specimen.

- Use of a tamperproof seal system designed in a manner that the specimen bottle can be sealed, revealing any unauthorized tampering (including unauthorized opening of the bottle). The system must allow for identification of the test subject, either by number or some other confidential mechanism.
- Use of a shipping container for transporting the specimens and associated paperwork which can be sealed and initialed to prevent undetected tampering.
- Written procedures and instructions for the collection site person.

The collection of specimen must be conducted in a suitable location and must contain all necessary personnel, materials, equipment, facilities, and supervision to provide for collection, security, and temporary storage and transportation of the specimen to a certified laboratory.

When the driver arrives at the collection site, the collection site employee will ask for identification. The driver may ask the collection site person for identification.

The driver will be asked to remove all unnecessary outer garments (coat, jacket) and secure all personal belongings. The driver may keep his/her wallet.

The drivers will then wash and dry his/her hands. After washing hands, the driver must remain in the presence of the collection site person and may not have access to fountains, faucets, soap dispensers, or other materials that could adulterate the specimen.

The driver is then instructed to provide his/her specimen in the privacy of a stall, or otherwise partitioned area that allows for privacy.

The specimen must consist of at least 45 ml of urine. The sample must then be split in front of the driver into a primary specimen of 30 ml and a second specimen (used as the split) of 15 ml. Both bottles must be shipped in a single shipping container.

Within 4 minutes after obtaining the specimen, the collection site person will measure its temperature. The acceptable temperature range is 90 to 100 degrees Fahrenheit. The collection site person will also inspect the specimen for color and look for any signs of contamination or tampering. Unusual signs must be noted on the collection form. Whether the specimen is suspected of being tampered with or not, it must be forwarded to the lab for testing.

If the collection site person believes the specimen was tampered with, a higher level supervisor of the collection site person, or a designated employer representative, shall review and concur with the collection site person that a second specimen will be collected immediately under the direct observation of a same gender collection site person.



The specimen must always be kept in the view of the collection site person and driver prior to the specimen being sealed and labeled. The specimen must be sealed and labeled by the collection site person in the presence of the driver. The identification label must be placed securely on the bottle and must contain the date, the individual specimen number, and any other identifying information required.

The driver must initial the identification label on the specimen bottle, certifying the specimen collected was his/hers.

All identifying information must be entered on the custody and control form by the collection site person.

The form must be signed, certifying collection was accomplished in accordance with the instructions provided. The driver must also sign this form indicating the specimen was his/hers.

Laboratory analysis: As required by FHWA regulations, only a laboratory certified by the Department of Health and Human Services (DHSS) to perform urinalysis for the presence of controlled substances will be retained by Graham Trucking, LLC. The laboratory will be required to maintain strict compliance with federally approved chain-of-custody procedures, quality control, maintenance, and scientific analytical Methodologies.

All specimens are required to undergo an initial screen followed by confirmation of all positive screen results. The confirmation process is done by gas chromatography/mass spectrometry (GC/MS), revealing a specific, scientific level of drug contained in a collected specimen.

Results: According to FHWA regulation, the laboratory must report all test results directly to Graham Trucking, LLC's medical review officer (MRO) within an average of 5 working days. All results, positive and negative, must be reported. Only specimens confirmed by the GC/MS as positive are reported as positive.

The MRO is responsible for reviewing and interpreting all positive results. The MRO must determine whether alternate medical explanations could account for the positive test results. The MRO must also give the driver who tested positive an opportunity to discuss the results prior to making a final determination that the test was positive. After the decision is made, the MRO must notify Graham Trucking, LLC.

If the MRO, after making and documenting all reasonable efforts, is unable to contact a tested driver, the MRO shall contact the Drug and Alcohol Compliance Administrator in the Safety Department. This company official will arrange for the driver to contact the MRO before going on duty.

The MRO may verify a positive test without having communicated with the driver about the test results if:



- The driver expressly declines the opportunity to discuss the results of the test;
- Neither the MRO or employer has been able to make contact with the driver for 14 days; or
- Within 5 days after a documented contact by the designated company official instructing the driver to contact the MRO, the driver has not done so.

Split Sample: As required by FMCSR, the MRO must notify each driver who has tested positive that he/she has 72 hours to request the test of the split specimen. If the driver requests the testing of the split, the MRO must direct (in writing) the lab to provide the split specimen to another certified laboratory for analysis.

Graham Trucking, LLC will not pay for the testing of the split specimen.

If the analysis of the split specimen fails to reconfirm the presence of the drug(s) or drug metabolite(s) found in the primary specimen, or if the split specimen is unavailable, inadequate for testing, or unstable, the MRO must cancel the test and report the cancellation and the reasons for it to the DOT, Graham Trucking, LLC, and the driver.

Specimen Retention: Long term frozen storage will ensure that positive urine specimens will be available for any necessary retest. Graham Trucking, LLC's designated drug testing laboratory will retain all confirmed positive specimens for at least 1 year in the original labeled specimen bottle.

### **Confidentiality/Recordkeeping**

All driver alcohol and controlled substance test records are considered confidential (Sec. 382.401). For the purpose of this policy/procedure, confidential recordkeeping is defined as records maintained in a secure manner, under lock and key, accessible only to the program administrator.

If the compliance administrator is unavailable, the Director of Safety will have access to the alcohol and controlled substance records.

Driver alcohol and controlled substance test records will only be released in the following situations:

- To the driver, upon his/her written request
- Upon request of a DOT agency with regulatory authority over Graham
- Upon request by the United States Secretary of Transportation
- Upon request by the National Transportation Safety Board (NTSB) as part of an accidental investigation
- Upon request by subsequent employers upon receipt of a written request by covered driver
- In a lawsuit, grievance, or other proceeding if it was initiated by or on behalf of the complaint and arising from results of the tests

- Upon written consent by the driver authorizing the release to a specified individual.

All records will be retained for the time period required in Sec. 382.401.

Driver Assistance Driver Education and Training (Sec, 382.601): All drivers will be given a copy of this policy.

Supervisor Training (Sec, 382.603): According to FMCSR, selected Safety and Recruiting personnel of Graham Trucking, LLC will receive training on this program. The training will include at least 60 minutes on alcohol misuse and 60 minutes on drug use. The training content will include the physical, behavioral, speech, and performance indicators of probable alcohol misuse and drug use. The training allows personnel to determine reasonable suspicion that a driver is under the influence of alcohol or drugs.

Referral, Evaluation, and Treatment (Sec. 382.605): According to FMCSR regulation, a list of substance abuse professionals will be provided to all drivers who fail an alcohol test or test positive for drugs.

## **Discipline**

According to FMCSR, no person who has failed an alcohol or drug test, or refused to test, will be allowed to perform safety-sensitive functions until the referral, evaluation, and treatment requirements have been complied with. The following company disciplinary measures apply to all reasonable suspicion, post-accident, and random tests.

Controlled Substance Positive Test Result: Upon notification that a driver tested positive for a controlled substance, the driver will be given the option of requesting a test of the split sample within 72 hours. If the driver has requested a test of the split sample, the driver will be suspended without pay until the results of a split sample are obtained.

If the driver doesn't request a split sample test or the split sample test confirms the initial positive result, the driver will be terminated.

If the split sample testing disputed the initial test results or if the initial test confirms the initial positive result, the driver will be reinstated.

Refusal to Test: A driver's refusal to test for alcohol or controlled substances will be considered a positive test result. Adulteration or tampering with a urine or breath sample is considered conduct that obstructs the testing process and will also be considered a refusal to test. A driver whose conduct is considered a refusal to test will be terminated.

Failed Alcohol Test Result: Upon notification that a driver has failed an alcohol test (0.04% BAC or greater), the driver will be terminated.



Upon notification that a driver tested 0.02% BAC or greater, but less than 0.04% BAC in initial and confirmatory tests for alcohol, the driver will be removed from being involved in safety-sensitive functions and suspended for 72 hours without pay.

### **Contraband Policy**

The following items at no time will be permitted to be transported in a commercial motor vehicle as long as the commercial motor vehicle is being operated as, for, or on behalf of Graham Trucking, LLC and/or its subsidiaries.

1. Radar Detectors. FMCSR Sec. 392.71.
2. Controlled Substances. Controlled Substances, as defined under FMCSR 382.107, are prohibited from possession or use unless a licensed medical practitioner specifically prescribes it to the driver as medication. However, this does not apply to the possession or use of a substance administered to a driver under the instructions of a licensed medical practitioner and who has advised the driver that the substance will not affect the driver's ability to safely operate a vehicle. FMCSR Sec. 392.4.
3. Alcohol. Alcohol, as defined under FMCSR 382.107, cannot be used within 4 hours of going on-duty. Nor shall a driver be in possession of alcohol while in physical control of a commercial motor vehicle. Alcohol cannot be transported on a commercial vehicle unless it is manifested as part of a load. Alcohol cannot be used for 8 hours following an accident that requires post-accident drug and alcohol testing. FMCSR Sec. 392.5, 382.209.
4. Police Scanners. Any device capable of receiving police frequencies is illegal in Michigan and several other states. MCLA 750.508.
5. Unauthorized Passengers, Unauthorized Drivers. Written authorization from Graham Safety Department is required to transport any person who is not a Graham Employee. Any person who operated a vehicle under Graham Trucking, LLC's authority must have attended orientation and have met all qualifications of FMCSR Sec. 391.11 and 392.60.

Drivers found transporting any of the above contraband will be subject to disciplinary action up to, and including, immediate dismissal.

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## Qualcomm Fundamentals

### Step 1: Login to System

- From HOME use LOGIN screen.
- Enter DRIVER ID.
- Enter PASSWORD (last 4 of ssn).
- Check the ACTIVE box if you are a solo driver. If you are on a team, check ACTIVE when you are the driver and INACTIVE when you are not the driver.
- If a prompt box appears, be sure to read it in full before answering.
- Your name will appear on the screen if you entered your information correctly.

### Step 2: Login to Dispatch

- From HOME use MESSAGING screen
- Use COMPOSE tab.
- Press CANCEL or CHANGE MACRO if macro list does not appear.
- Scroll to and select DISPATCH LOGIN.
- Enter and send your info.
- Messages take 10 minutes to come through.

### Step 3: Pre-Trip Inspection

- From HOME use HOURS OF SERVICE/VIR screen.
- Use STATUS tab.
- Inspection must be shown as ON DUTY.
- Tap REMARKS from the bottom right of screen.
- Tap the arrow in the left message box that appears.
- Scroll to and select PRE-TRIP INSPECTION and select okay at the bottom right of the screen.
- Tap the VIR tab at the top right of the screen under the DOT clock.
- Select and read previous tractor and trailer inspection.
- Select and complete your own tractor and trailer inspections.
- Do a complete, 15-minute level two inspection.
- Report any issues to your driver manager and call them into maintenance.
- You are required to submit DVIR documentation of any damage or mechanical problems found during inspection.

A thorough pre-trip and post-trip inspection is essential to the safe operation of equipment. We require a report of damages to all company equipment be made when the damage is first noticed.

Failure to report damages could result in being charged for damage whether you are at fault or not.

#### **Step 4: Retrieve Load Information**

- From HOME use MESSAGING screen.
- Use INBOX tab.
- Scroll to and select LOAD HEADER and subsequent messages.
- Tap LOAD HEADER and hit REPLY twice.
- Enter and send the information the screen is asking for.
- Load header is the first message dispatch will send and will be on the bottom of the other load messages.
- All other messages will be above load header in chronological order.
- Tap PUP-A and hit REPLY twice.
- Enter and send the information the screen is asking for.
- Tap PUP-D and hit REPLY twice.
- Enter and send the information the screen is asking for.
- Tap DRP-A and hit REPLY twice.
- Enter and send the information the screen is asking for.
- Tap DRP-D and hit REPLY twice.
- Enter and send the information the screen is asking for.
- Arrivals tell dispatch you are not in the right place.
- Departs tell dispatch you are leaving your location.

#### **Step 5: Post Trip Inspection**

- From HOME use HOURS OF SERVICE/VIR screen.
- Use STATUS tab.
- Inspection must be shown as ON DUTY.
- Tap REMARKS from the bottom right of screen.
- Tap the arrow in the left message box that appears.
- Scroll to and select POST TRIP INSPECTION and select okay at the bottom right of the screen.
- Tap the VIR tab at the top right of the screen under the DOT clock.
- Select and complete tractor and trailer inspections.
- Report any issues to your driver manager and call them into maintenance.
- You are required to submit DVIR documentation of any damage or mechanical problems found during inspection.

### Step 6: Edit and Approve Logs

- From HOME use HOURS OF SERVICE/VIR screen.
- Find and use the APPROVE tab which is in the same line as STATUS.
- Scroll through your day. If all is correct hit APPROVE.
- If something is incorrect, tap the entry and select edit at the bottom right of your screen.
- You can EDIT anything except drive time.
- Double check accuracy and APPROVE your logs.

### Step 7: Change Duty Status

- From HOME use HOURS OF SERVICE/VIR screen.
- Use the STATUS tab.
- Tap the arrow on the message box that will appear on your screen and scroll to OFF.
- Send the information and make sure your duty status is set to off.

### Step 8: Logout of Dispatch

- From HOME use MESSAGING screen.
- Use COMPOSE tab.
- Press CANCEL or CHANGE MACRO if macro list does not appear.
- Scroll to DISPATCH LOGOUT.
- Enter and send your info.

### Step 9: Logout of System

- From HOME use LOGIN screen.
- Select LOGOUT from the bottom of the screen.
- Select OKAY from the prompt box.

### Miscellaneous Items

Buttons may be different on your screen, depending on the model you have in your truck. All information will be the same.

### Home Screen Options

- The HOUSE icon at the top will bring you to the home page at any time.
- The KEYBOARD icon at the top will bring up your keyboard.
- The GRAPH icon at the top is your signal strength.

- The EXCLAMATION POINT icon at the top, when lighted, is informing you of an urgent message in your inbox.
- The ENVELOPE icon at the top, when lighted, is informing you of a regular email.
- The DOT clock at the top tells you how much time you have before you are in violation of HOS.
- The ARROW LEFT at the bottom takes you to the previous screen.
- The TOOLS icon at the bottom is your settings.
- The QUESTION MARK icon at the bottom may help if you are stuck.
- Other buttons will appear depending on the screen you are on, usually in the bottom right corner. You may see OKAY, CANCEL, EDIT, CHANGE, REMARKS, etc.

### **Duty Statuses**

- OFF = Off Duty
- SB = Sleeper Berth
- DRV = Driving
- ON = On Duty, Not Driving
- ODD = Off Duty Driving
- HOS automatically puts the active driver in DRV when the truck is in motion for 2 miles or when speed reaches 25 mph.
- HOS automatically puts the active driver in ON when the truck has been stopped for 5 minutes.
- All other duty statuses must be changed manually.
- Minimum duty status time is 5 minutes. If status changes within 5 minutes, previous status is eliminated.

### **HOS Rules**

- Driving time – 11 hours
- Off duty time – 10 consecutive hours
- Driving window – no driving after 14 consecutive hours after starting the day, but on duty time can continue after that time is reached.
- Duty cycles – 70 hours/8 days
- Break requirements – may drive a CMV only if it has been 8 hours or less since the last break of at least 30 minutes.
- Restart – a 34-hour off duty period will reset the 70-hour clock.

**Safety Department – 662-449-8367**



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All drivers are given this safety manual at orientation and sent to them digitally. Safety manuals should be kept with the truck and if there are any questions or concerns to contact the office.

This safety manual is subject to updates and changes.