



# EMPLOYEE HANDBOOK TABLE OF CONTENTS

|   |    |  |    |
|---|----|--|----|
| COVER PAGE .....  | 1  | ENDING EMPLOYMENT.....   | 15 |
| WELCOME .....   | 3  | BREAK POLICY.....  | 15 |
| PURPOSE OF THIS DOCUMENT.....   | 3  | CELL PHONES.....   | 15 |
| VISION STATEMENT AND ORGANIZATIONAL CULTURE .....                               | 3  | DRESS CODE .....   | 16 |
| MISSION STATEMENT .....   | 3  | COMPUTER AND USE OF TECHNOLOGY POLICY .....                            | 16 |
| GUIDING VALUES AND HISTORY .....  | 4  | SOCIAL MEDIA POLICY .....  | 17 |
| BOARD OF DIRECTORS AND OWNERSHIP INFORMATION.....                               | 4  | FIREARMS .....   | 17 |
| EQUAL OPPORTUNITY & AT-WILL EMPLOYMENT.....                                     | 4  | SMOKING .....  | 17 |
| CONFIDENTIALITY AGREEMENT .....   | 4  | INJURY REPORTING AND RETURN-TO-WORK POLICY .....                       | 18 |
| STANDARDS OF CONDUCT .....  | 4  | FAMILY MEDICAL LEAVE ACT .....   | 20 |
| PERSONNEL FILES AND PRIVACY POLICY .....  | 4  | SECURITY PLAN.....   | 20 |
| EMPLOYEE BENEFITS.....  | 5  | SECURITY POLICY .....  | 22 |
| EMPLOYMENT STATUS.....  | 6  | MOTOR VEHICLE GUIDELINES & INSURABILITY .....                          | 13 |
| COMPENSATION POLICY AND PAYROLL.....  | 7  | ALCOHOL AND SUBSTANCE ABUSE.....                                       | 23 |
| FINDLAY CITY TAX REFUND FILING.....   | 7  | DISCIPLINARY PRACTICES AND DISPUTE RESOLUTION.....                     | 26 |
| ATTENDANCE AND ABSENTEEISM POLICY .....   | 7  | DRIVER RESPONSIBILITIES (CDL & NON-CDL DRIVERS) .....                  | 27 |
| APPLICATION FOR EMPLOYMENT .....  | 10 | SAFETY RULES FOR TOWMOTOR & POWER VEHICLE OPERATORS<br>(NON CDL) ..... | 30 |
| PRE-EMPLOYMENT DRUG AND ALCOHOL .....   | 10 | WHAT TO DO IN CASE OF AN ACCIDENT ON THE ROAD.....                     | 31 |
| ORIENTATION AND ON-BOARDING .....   | 11 | EMPLOYEE SAFETY, INJURY, AND MEDICATION POLICY.....                    | 33 |
| LICENSE REQUIREMENTS.....   | 11 | ANTI-DISCRIMINATION POLICY .....                                       | 33 |
| DRIVING QUALIFICATIONS .....  | 11 | HARASSMENT POLICY.....   | 33 |
| DRIVER ACCEPTABILITY CRITERIA & MVR GUIDELINES (CDL & NON-<br>CDL DRIVERS)..... | 11 | SEXUAL HARASSMENT POLICY .....   | 34 |
| CDL DRIVER ROAD TEST AND CERTIFICATE .....                                      | 13 | REPORTING HARASSMENT .....   | 35 |
| PHYSICAL EXAMINATION AND CERTIFICATE.....                                       | 14 | INDEX.....   | 37 |
| EMPLOYEE SCHEDULE POLICY.....   | 14 | CONFIDENTIALITY AGREEMENT .....  | 38 |
| CHANGING POSITIONS .....  | 14 | ACKNOWLEDGEMENT OF HANDBOOK WITH SIGNATURE.....                        | 39 |
| PERFORMANCE REVIEWS.....  | 14 |  |    |

## WELCOME

Welcome to Findlay Warehousing! One of the keys to our success is hiring good employees. We have hired you because we believe you have the skills and the potential to help our Company succeed. We expect employees to perform the tasks assigned to them to the best of their abilities. We believe that hard work and commitment will not only benefit Findlay Warehousing Co., Inc. but will help give all our employees a sense of pride and accomplishment.

## PURPOSE OF THIS DOCUMENT

The contents of this Employee Handbook are presented for purposes of information only. The policies, procedures and guidelines outlined in this employee handbook apply to all employees. From time to time, it may be necessary to amend or change the contents. Findlay Warehousing Co., Inc. reserves the right to modify, revoke, suspend, terminate, or change any or all such plans, policies, procedures, or guidelines in whole or in part, at any time, with or without notice. The language set forth in this Employee Handbook is not intended to create, nor is it to be construed to create a contract of any kind between Findlay Warehousing Co., Inc. and any or all its employees.

## VISION STATEMENT AND ORGANIZATIONAL CULTURE

"If we don't serve the customer, someone else will!" Our goal is to ensure our customers are taken care of so in turn, our company can be successful. It takes everyone's effort to make this happen, that's why we hire good employees to help our company and our customers be successful.

## MISSION STATEMENT

The safety of our employees, our customers and their employees, the public and Company operation is paramount. Senior Management is committed and considers the safety and health of its employees to be of the greatest importance. It is the **goal** of the Company, therefore, and the Company's first priority to provide and maintain a safe work environment and healthy working conditions for our employees. The Company intends to comply with all safety laws and/or ordinances.

By the forming of a work safety committee this will enable us to meet our goal. Our safety committee is comprised of both hourly and management personnel and will enable all segments of our employees to participate in the safety management process. The function of the safety committee is to recognize risk factors, conduct safety audits, accident investigations, and to implement the safety solutions.

Safety will take precedence over expediency or short cuts and every employee should attempt to reduce the possibility of accident occurrence and maintain a safe work environment. Each employee, who conducts the affairs of the corporation, no matter in what capacity he/she may function, must accept this responsibility.

It is a basic responsibility of all managers and supervisors to make the safety of the employees a daily part of their management duties. In the event of an employee injury, accident, or illness the Company is fully committed to facilitate and assist a return to work at the earliest opportunity.

Mr. Thomas Vanderhoff  
President and CEO  
July 1, 2006

## GUIDING VALUES AND HISTORY

Findlay Warehousing's history begins with company founder Richard Ruehle who acquired Findlay Truck Line and started Findlay Cartage in 1969. While running only transportation services, in the mid 1980's there was a need for warehousing space and services in the Findlay, Ohio area. This need for warehousing spawned a property acquisition, and thus the birth of what was later to be named "Findlay Warehousing." Ruehle's team and their unwavering commitment to the customer has transformed this humble entrance into warehousing of an initial 16,000 square foot, old brick building into nearly a million square feet of warehouse space today.

## BOARD OF DIRECTORS AND OWNERSHIP INFORMATION

Mr. Tom Vanderhoff  
President and CEO

## EQUAL OPPORTUNITY & AT-WILL EMPLOYMENT

Findlay Warehousing Co., Inc. offers equal opportunity and equal consideration to all persons who seek employment with the Company, and to those who are already employed by the Company. No employee or applicant will be discriminated against based on race, color, ancestry, religion, creed, national origin, sex, sexual orientation, sexual identification, age, veteran status and/or handicap. It is our firm belief that our Equal Employment Opportunity Policy will be furthered in an environment of mutual trust where employees are encouraged to discuss their problems with members of management.

## CONFIDENTIALITY AGREEMENT

In the course of your work at Findlay Warehousing Company you may have access to information about our business, our customers, and our employees, which is confidential. Our customers give us information about them in the strictest confidence and expect this confidence will be respected. This information should not be discussed with anyone, except in connection with your work. Additionally, any company or employee information should not be discussed with anyone, except in connection with your work. Records relating to employees or customers shall not be released without prior approval from management. Disregard for this policy may result in discipline, up to and including discharge.

## STANDARDS OF CONDUCT

Findlay Warehousing Co., Inc. is a professional warehousing facility and trucking company. The Company expects all employees to always conduct themselves in a professional manner. All persons involved are expected to act properly with respect and courtesy to all - including customers, salespeople, contractors, and fellow workers whether on the phone or in person.

Anyone found conducting in less than acceptable behaviour will be disciplined, up to and including discharge. Conduct that is considered unacceptable includes but is not limited to using profanity, driving in an unsafe aggressive manner, harassment as described in the harassment policy, causing or intending to cause harm to an individual or business or property of either, making inappropriate gestures, wearing inappropriate clothing, etc.

## PERSONNEL FILES AND PRIVACY POLICY

You must report any changes in the following personal information to the Office Manager and/or the Safety Director so that your records may be kept current.

- Name
- Home Address
- Telephone Numbers
- Marital Status
- Beneficiaries
- Home Address

- Emergency Contacts
- Change in Dependents

## EMPLOYEE BENEFITS

### Paid Holidays

After thirty days of employment, full-time employees are eligible for paid holidays which include New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving, day after Thanksgiving, Christmas Eve, and Christmas Day if they fall on a scheduled workday. The employee must work or have an approved paid time off day the scheduled day before and the scheduled day after to receive the holiday pay.

### Paid Time Off

Full-time employees will receive paid time off (PTO) after one year of service (not including time worked through a staffing agency). One week of PTO will equal 40 hours. PTO is set after:

- One year – 40 Hours of PTO
- Two years – 80 Hours of PTO
- Ten years – 120 Hours of PTO
- Twenty years – 160 Hours of PTO

**Example: Your hire date is May 1, 2005. You would be eligible for one-week of PTO on May 1, 2006, two weeks' PTO per year after May 1, 2007, three weeks' PTO per year after May 1, 2015, and four weeks PTO after May 1, 2025.**

PTO requests should be turned in no less than three days before the requested time off. PTO requests can be used in 4, 8, & 12-hour increments. All requests must be filled out based on off pay period increments which may result in filling out two or more requests for the same requested time off. All requests are subject to approval by management and any conflict that cannot be resolved may lead to *first come first serve*. (It is the employee's responsibility to get confirmation that the request was approved to prevent receiving an attendance occurrence.)

**Example: If you take Friday, June 1<sup>st</sup> off and plan to return Monday, June 11<sup>th</sup>, you will turn in three requests. One request for 6/1 – 6/2, a second request for 6/3 – 6/9, and a third request for 6/10. You're return date would be filled out with 6/11 for when you plan to return on each form.**

### Unpaid Time Off

Employees, regardless of employment status, may put in a request for unpaid time off. Unpaid time off (UTO) requests should be turned in no later than 3 days prior to the requested time off. In the event a request cannot be submitted prior to 3 days, please notify a supervisor of the situation.

UTO requests are not guaranteed and cannot be approved more than a week from the requested time off. PTO requests will take priority up to the 1-week cut-off, then first come first serve will prevail. There is no set amount of UTO that an employee can request, but PTO must be exhausted before requesting UTO and too many requests will result in getting denied due to too much time off. Findlay Warehousing Co., Inc. cares about the employee's personal time however when you took the job, you were informed of the expectation of hours worked each week during employment, which could be negatively impacted by requesting too much time off in a year.

It is the employee's responsibility to get confirmation that the request was approved to prevent receiving an attendance occurrence. Requests must be submitted using the same format as PTO (see above in bold).

### Shift Premiums

Findlay Warehousing offers shift premiums for certain shifts, premiums will be communicated with the employee prior to accepting the shift. Employees will sign paperwork before receiving a shift premium to ensure they understand the amount of the shift premium, and the shift they are working. Employees will be paid their base pay during training.

Shift premiums will be over and above your base pay rate. Shift premiums will be calculated if you work overtime, but base pay will be used for other calculations. Holiday Pay, Bereavement pay, PTO pay, performance raises, and other extra compensations will be calculated from your base pay.

### Overtime

Employees will be compensated at a time and a half rate for any time worked over 40 hours in a one-week time period starting Sunday morning and ending Saturday night. The time and a half rate will be based off the employee's base rate plus shift premium (if a shift premium is applicable). Time worked does not include holiday, bereavement, and PTO.

### **Funeral Leave**

In the event of a death in the family (father, mother, wife, husband, brother, sister, son, daughter, stepchildren, mother-in-law, father-in-law or other approved by senior management), a full-time employee, who has worked 30 days or more from hired date, shall be entitled to a maximum of three paid days off ending on the day of the funeral. To receive payment for bereavement, the days involved must be days for which the employee would otherwise be compensated. Record of death may be required for documentation purposes.

If a loved one not listed above passes away, you may request the day off for the funeral, without pay. Record of death may be required for documentation purposes and this must be submitted for approval as soon as a funeral date is determined.

### **Jury Duty Leave**

If you are a full-time employee and are called for jury duty, you will be compensated. The rate will be regular pay up to eight hours per day less the pay you receive from the court. To receive this, you will be required to bring in a written statement to the Office Manager showing the amount paid by the court.

### **Insurance**

On the first of the month that follows 60 days of hire as a full time Findlay Warehousing employee with an average of 30 worked hours per week or more, employees may sign up for Medical, Dental, Vision and Life coverage. Additional insurance is also available including accidental, disability, life, cancer, etc. The employee is responsible for choosing what type of insurance is best for him or her. Insurance is deducted weekly through payroll.

An employee on medical leave will be able to continue their medical coverage for up to 60 days. The Company will continue to pay the employer's part of the premium and the employee must pay their part. If the medical leave extends more than 60 days, the employee will then have to pay the full premium until he or she returns to work.

### **401K Plan**

After one year of employment at Findlay Warehousing Co., Inc., not including time worked through a staffing agency, full-time employees are eligible to enrol in the 401K plan. Enrolments or changes must be turned in before January 1<sup>st</sup>, April 1<sup>st</sup>, July 1<sup>st</sup>, and October 1<sup>st</sup>. These are the only times a plan may be changed. More information on the 401K plan will be given out after one year of employment is complete.

## **EMPLOYMENT STATUS**

### **Regular Full-time Employees**

All employees who work an average of (not less than) thirty hours per week. Regular full-time employees are eligible to receive benefits as provided for herein.

### **Regular Part-time Employees**

All employees who work less than an average of thirty hours per week on a regular basis. Regular part-time employees are not eligible to receive benefits, except as provided herein.

### **Temporary Employees**

All employees who are retained on temporary basis. Temporary employees are not eligible to receive benefits until they are offered full time employment.

### **Exempt Employees**

All executive, professional and administrative employees as defined by the Fair Labor Standards Act, as amended and all employees subject to the qualification and hours of service regulations of the Secretary of Transportation are exempt from overtime compensation.

### **Introductory Period**

To become a "regular" employee (either full or part-time), each employee must complete an initial introductory period of ninety (90) days following initial employment or reemployment.

All employees hired through a temporary service shall serve an introductory period of 520 hours worked from the first date of hire.

All employees hired directly will serve an introductory period of 90 days.

The introductory period will be utilized to train and evaluate the employee's effective adjustment to work tasks, conduct, observance of rules and regulations, attendance, and job responsibilities. The introductory period may be extended for a period of time, at the discretion of the supervisor in consultation with Human Resources. During the introductory period,

Findlay Warehousing Co., Inc reserves the right to terminate the employment relationship with any introductory employee at will and without advance notice. Successful completion of your introductory period does not alter the at-will status of your employment thereafter.

During your introductory period, you may not be eligible to receive medical benefits as well as holiday pay for regular scheduled holidays or any other paid days off. If a driver leaves employment within the introductory period and the company paid for pre-employment drug/alcohol screening and/or DOT physical, the driver will be responsible for the cost of this pre-employment testing and the cost will be taken out of the driver's last check.

## COMPENSATION POLICY AND PAYROLL

Employees receive paychecks weekly, with the first week held at the beginning of employment. All compensation and payroll questions should be directed to the payroll department or Human Resources. Supervisors are not privileged to any employee's salaries or wages.

## FINDLAY CITY TAX REFUND FILING

To all employees that are going to file for City of Findlay tax refunds:

Per our Accountant and Tom Vanderhoff,

Tom will NOT BE signing any City of Findlay tax refund forms without documentation of you keeping track of your hours worked in and out of the Findlay city limits. We need a copy of this to keep with our files for anything Tom should sign.

## ATTENDANCE AND ABSENTEEISM POLICY

Findlay Warehousing has implemented a no-fault attendance policy. The no-fault attendance policy system runs over a 12-month calendar year and takes effect on the date of the first occurrence or half occurrence. For example, if you receive an occurrence on April 20<sup>th</sup> of 2019, that occurrence falls off on April 20<sup>th</sup> of 2020. All employees start with a "clean slate" and the attendance policy only takes effect in the event you meet the following criteria.

| Full Time Employee   | Occurrences    | Discipline Step and Action    |
|--|----------------|-------------------------------|
| 1 Occurrence is equal to:<br>1 Absence<br>2 Tardies<br>2 Missed Clocks | 4 Occurrences  | Step 1: Verbal Warning        |
|  | 6 Occurrences  | Step 2: Written Warning       |
|  | 8 Occurrences  | Step 3: Final Written Warning |
|  | 10 Occurrences | Step 4: Termination           |

|   |               |                                     |
|---|---------------|-------------------------------------|
| Single Day No Call/No Show                | 1 Occurrence  | Step 2: Written Warning             |
| 2 or more consecutive days means you quit | 2 Occurrences | Step 3: Final Written Warning       |
|   | 3 Occurrences | Step 4: Could result in Termination |

| Introductory Period   | Occurrences   | Discipline Step and Action          |
|---|---------------|-------------------------------------|
| 1 Occurrence is equal to:<br>1 Absence<br>1 Tardy<br>1 Missed Clock | 1 Occurrence  | Step 2: Written Warning             |
|   | 2 Occurrences | Step 3: Final Written Warning       |
|   | 3 Occurrences | Step 4: Could result in Termination |
|   |               |                                     |

### Absence

An absence is defined as you were not here for your scheduled shift, either for an approved time off period or unapproved time off period. Approved absences will not incur an occurrence, however unapproved absences may incur an occurrence.

### Calling off/Calling In

Anytime an employee is going to be absent or tardy (excluding approved time off), they must call into the main office at 419-423-0450 and leave a message with whomever takes your call. If you miss multiple days, you must call each day unless a doctor's excuse has been submitted covering future dates of time off.

Whomever takes the call in the office will relay the call-off or call-in for tardy to the management call-off email group, so all members of management are aware of the situation. When you call in, you are expected to give a reason. If your reason is personal, or involves sensitive information, you may request to speak to someone in Human Resources or ask for

Human Resources to contact you at their earliest convenience. We will leave that up to each employee on how they want their reason communicated with the management team as long as a reason is provided in some way.

Please keep in mind, you were expected to be here for your shift so in the event you're going to be late, or not in for your shift at all, the more notice you can provide, the easier it will be to cover your workload.

### **Approved Absences**

You must have supervisor authorization prior to taking time off, please see the Paid Time Off policy for filling out requests for leave. Unpaid time off cannot be requested until all paid time off has been exhausted. The only time unpaid time off can be requested without using PTO would be through conversation with senior management.

### **Approved Absence Examples**

- Approved paid time off submitted 3 days or more from requested dates off
- Approved bereavement
- Approved doctor's appointment taking no more than 3 hours of your shift (5 hours or more total must be worked during your scheduled shift to be eligible)

### **Approved Paid Time Off**

Full time employees who have reached one or more years of service may submit requests for paid time off. Please see the Paid Time Off policy for more details.

### **Approved Unpaid Time Off**

Unpaid time off requests must be submitted, similar to paid time off request. Please see the Paid Time Off policy for more details.

Approval for unpaid time off will not be approved more than 1 week before the requested dates *and* a 3 days' notice minimum is required for approval. Unpaid time off will be subject to management's approval and paid time off will take priority up to the 1-week deadline of an unpaid time off request.

**For example, if you put in request on May 5<sup>th</sup> for June 9<sup>th</sup> off, your request may not be considered until June 2<sup>nd</sup>.** If an instance occurs that requires a tie breaker, the tie breaker will be determined by situational basis on fairness for instances less than 1 week of requested dates. **Using the previous example, if you put in a UTO request for June 9<sup>th</sup> and someone else puts in a PTO request on June 1<sup>st</sup>, for June 9<sup>th</sup>, your UTO request may be denied due to PTO taking precedence.**

Approved unpaid time off will *not* issue any occurrences due to the approval process granting the time off request being unpaid. Unpaid time off will not be granted until paid time off is exhausted unless approved by senior management.

Shift switching will not generate an occurrence to the person asking to switch shifts as long as the company isn't impacted by overtime, a supervisor must be notified prior to switching shifts. If overtime is required, management must approve the shift switch *prior* to the shifts affected

### **Approved Doctor's Appointment**

In some instances, it's hard to schedule doctor's appointments around your work schedule. When you're unable to do so, you may submit a request to leave for a period up to 3 hours within your scheduled shift to be able to attend your appointment. This time can be at the beginning of your shift, in the middle, or at the end of your shift. You must work at least 5 hours of your scheduled shift, to not interrupt the company's needs. **For example, if you're scheduled 6:30am – 3pm, you must clock in at 6:30am, and/or clock out at 3pm with no more than 3 hours lost from your regular scheduled shift.** Asking to alter your schedule by coming in earlier or staying over later than scheduled impacts the company's needs, and senior management would have to approve this.

A note or excuse showing you were at the doctor during this period will be needed and should be turned in the next scheduled day you work, or when you return to work after your appointment. 3 days or more notice applies just like a PTO or UTO request. If you're unable to give a 3-day notice, senior management will have to authorize the request otherwise you may be subject to ½ an occurrence for leaving early.

### **Unapproved Absences**

You will incur an occurrence or half an occurrence depending on the offense. A request for leave must be submitted stating the employee chooses to use PTO in place of UTO if the employee chooses to use PTO for an unapproved absence. If a request for PTO isn't submitted, UTO will be used.

Using PTO does *not* eliminate an occurrence, if an absence or tardy is considered unapproved, using PTO only effects the employee's paycheck for the time missed if they chose to supplement.



The PTO request must be submitted no more than two scheduled workdays after the absence. If the employee cannot submit their request by Sunday of that work week, please text your supervisor to inform our payroll department and then fill out a form when returning the following week.

If a request for leave form isn't submitted within two scheduled workdays, PTO will not be used, and the absence or tardy will be unpaid.

### **Unexcused Absence Examples**

- Sick day
- Unapproved bereavement
- Unpaid day off (excluding approved UTO)
- Car troubles or not having a ride to work
- Not having a babysitter
- Calling in that you'll be late and not coming in for half or more of your shift
- Not coming in on your on-call shift when you're called to come in
- Any other reason not approved

### **Sick Days**

A sick day will still result in an occurrence for each day missed. In the event you miss two or more days consecutively and bring in a doctor's excuse for the days missed, only one occurrence will be given based on the total days covered by the doctor's excuse.

Doctor's excuses will be required based on the rules explained in the handbook. A doctor's excuse must cover all days missed to be counted under 1 occurrence otherwise an occurrence will be given for each day missed.

### **Bereavement Leave**

Consists of the number of days *and* approved family members covered by the handbook.

### **Funeral Leave (Non-Bereavement)**

One (1) day approved leave outside of the bereavement policy will be granted for a grandparent or any other instance approved by senior management. No occurrence will be issued for approved funeral leave.

- Two or more days missed will result in an occurrence per after the approved day unless other arrangements are approved by senior management.
- The employee has the option to use PTO or UTO for their time off for funeral leave.
- Funeral leave does require documentation, or a program turned into Human Resources when the employee returns to work.

### **Tardy**

A tardy is defined as coming in late or leaving early, even if only by a minute. If a supervisor offers to let you leave early due to lack of work, this doesn't not count as a tardy as long as your supervisor marks your timecard

#### **Late**

- Reporting to work 30 minutes or less past your scheduled start time
- Calling in 30 minutes or less past your scheduled start time stating you're running late and will be in

#### **Leaving early**

- Sick
- Family emergency (without documentation at a later date)
- Any other reason unapproved

### **Missed Clock**

A missed clock is defined as not clocking in for your shift before starting your workday or not clocking out at the end of your shift. Forgetting to clock out or back in from lunch, when leaving the property, is considered a missed clock. A supervisor must be notified that you didn't clock in or out so that they may enter you in for your scheduled shift.

### **No Call / No Show**

No call/no show is defined as not showing up for your scheduled shift at all or calling 31 minutes or more past your scheduled shift even if you report to work at some point later in your shift. To not be considered a no call/no show, you must report to work or call no later than 30 minutes after the start of your shift.

- In the event an employee no call/no shows two days in a row, Findlay Warehousing will consider your employment terminated based on your choice to quit your position.
- Three occurrences of no call/no show in a 12-month period can result in termination.

### **90-Day Introductory Period**

During an employee's first 90 days, whether as a direct hire or through a staffing service, a 90-day introductory period will go into effect day one while the employee gets situated. During that time, if an employee has an unexcused absence, a

tardy, a missed clock or a no call/no show, an occurrence will be issued. Once 3 total occurrences are reached, the employee's position will be terminated.

### **Amendments**

12/16/19

- Approved PTO must be submitted 3 days or more to requested date
- Doctor's appointments may be approved to allow employee to miss up to 3 hours of scheduled work with a note from doctor
- Approved UTO will not result in an occurrence but will not be decided no more than 7 days prior to requested time off
- Shift switching does not result in occurrences but may require approval

2/10/20

- Unapproved bereavement for a funeral, which may still be approved for a day off without occurrence, allows employee to choose whether to use PTO or UTO

3/5/20

- Updates to PTO requirements

## **APPLICATION FOR EMPLOYMENT**

All employees will be required to fill out an application for employment, furnished by Findlay Warehousing Co., Inc. Each application includes a release to run background and MVR checks.

### **CDL Driver Application**

CDL drivers will be required to fill out additional information required under section 391.21 of the FMCSR.

Findlay Warehousing Co., Inc.'s hiring standards require that driver applicants list all employment for the last three years and all commercial driving experience for the past 10 years. Any gaps in employment for more than a two-month period must be satisfactorily accounted for.

Findlay Warehousing Co., Inc. will contact all former and current employers of the driver applicant for the previous three 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
- 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 Findlay Warehousing Co., Inc.'s inquiries must be in writing and will be retained in the employee's (if hired) qualification file. In the event a former or current employer refuse to release information, a note stating this will be placed in the file.

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

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)

## **PRE-EMPLOYMENT DRUG AND ALCOHOL**

Findlay Warehousing Co., Inc. requires applicants to submit to a pre-employment drug and alcohol screen to be conducted at a collection site designated by the company. The applicant shall not be offered employment until a negative test result has been reported. Driver's collections will be sent out to a lab to meet DOT examination requirements. (FMCSR, Sec. 382.301)

## ORIENTATION AND ON-BOARDING

Once an employee is hired, Findlay Warehousing Co., Inc. will schedule the new hire to come in for orientation. This will be done prior to any training or work assignments unless upper management approves altering the on-boarding process.

### Orientation Videos

Each new employee will sit through orientation videos that cover the main aspects of what Findlay Warehousing Co., Inc. expects. The intention of the videos is to help introduce you to our company, the expectation we require for our food grade areas since most people are not aware of the rules and requirements and covers a lot of topics that most new employees would have questions about.

### Hire-In Paperwork

New employees hired directly with the Company will sit down with someone from our payroll department to go over all necessary paperwork to enlist you as a new employee. If you were sent to us through a staffing service, this portion of the orientation will be scheduled at a later date once you've become eligible to be hired direct.

### Warehouse Paperwork

In order to become an employee, you must read through and sign off on paperwork that covers the expectations of the position you accepted. Some paperwork is a formality, as another way to introduce and explain the Company's expectations during your employment. Other paperwork explains your duties or general knowledge. You will receive copies of the documents and standard operating procedures that you're expected to sign off on, so that you may refer to them at your convenience during your employment.

## LICENSE REQUIREMENTS

Any employee that will be asked and/or required to drive a company vehicle cannot have more 4 points on their license. If an employee is hired, who possesses more than 4 points on their license, they will be required to sign off that they will not drive a company vehicle and if they're asked to by a supervisor, they will inform the supervisor they are not permitted to do so.

Findlay Warehousing Co., Inc.'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 Findlay Warehousing Co., Inc. vehicles, has the appropriate endorsements, 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)).

## DRIVING QUALIFICATIONS

Findlay Warehousing Co., Inc.'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 Findlay Warehousing Co., Inc.'s values and goals of operating in a safe, legal, and professional manner.

Findlay Warehousing Co., Inc.'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 Findlay Warehousing Co., Inc. vehicles, has the appropriate endorsements, 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)).

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

## DRIVER ACCEPTABILITY CRITERIA & MVR GUIDELINES (CDL & NON-CDL DRIVERS)

MVRs are required on all new applicants and renewals. MVRs are to be less than 90 days old.

Any driver that has had a DWI/DUI conviction in the past 3 years is not eligible.

All CDL drivers must possess a valid CDL and current DOT physical/medically certified. Non-CDL drivers will be required to possess a current DOT physical/medical certificate.

## Age Requirements

Driver's ages 18 to 22:

- Anyone approved to drive a non-CDL vehicle for transporting goods must be appropriately trained and signed off by the Logistics Manager and Safety Director before operating a Non-CDL motor vehicle
  - Examples of a non-CDL vehicle would be a pickup truck, sprinter van or box truck with less than 26000 GVWR
- No major violation in the preceding 36 months
- Three (3) or less violations or a maximum of one (1) accident and one (1) violation in the preceding 36 months
- No more than one (1) violation in the preceding 12 months
- Must have three (3) years of driving experience in the type of vehicle to be insured
- Drivers' underage of 23 should be accepted only under special circumstances, on a limited basis, and with thorough file justification.

If age 23 or 24:

- No major violation in the preceding 36 months
- Three (3) or less violations or a maximum of one (1) accident and one (1) violation in the preceding 36 months
- No more than one (1) violation in the preceding 12 months
- Must have three (3) years of driving experience in the type of vehicle to be insured

Age 25 or older:

- No major violation in the preceding 36 months
- Four (4) or less violations or maximum of one (1) accident and two (1) violations in the preceding 36 months
- No more than two (2) violations in the preceding 12 months
- Must have two (2) years driving experience in the type of vehicle to be insured

Drivers 65 years and older require a copy of their current DOT physical/medical card or MVR must note they are medically certified.

## Accidents

All accidents will be considered at-fault unless the insured or driver can produce satisfactory evidence to demonstrate they were not at fault.

## Major Violations

Major violations include but are not limited to:

- Aggravated assault with a motor vehicle
- Conviction of a false statement involving a driver's license application
- Driving under the influence of alcohol and/or drugs (DWI/DUI/OMV)
- Physical control intoxication
- Refusing an alcohol/chemical test (implied consent)
- Fleeing or eluding a police officer
- Leaving the scene of an accident
- Manslaughter resulting from the operation of a motor vehicle (gross negligence)
- Operating a motor vehicle without the owner's authority (grand theft)
- Operating a vehicle without a license or while under suspension or revocation
- Permitting an unlicensed person to drive
- Racing or speed contest
- Reckless driving
- Using a motor vehicle in the commission of a felony
- Violation of a railroad crossing
- Speeding more than 15 mph over posted limit (subject to underwriter's discretion)
- Speeding in work/construction zone
- Illegal passing of a school bus failure to yield to emergency vehicles
- Evading responsibility after an accident (hit & run)
- Operating a CMV while texting
- Using a hand-held mobile telephone while operating a CMV
- Allowing or requiring a driver to use a hand-held mobile telephone while operating a CMV
- Operating a CMV while ill or fatigued
- Driving after being declared out-of-service for HOS violation(s)
- Driver uses or is in possession of drugs
- Operating a CMV with more than 1 driver's license
- Operating on a learner's permit without a CDL holder
- Operating on a learner's permit without a valid driver's license
- Driving a CMV while disqualified from holding a CDL
- Driving a CMV while CDL is suspended for a safety-related or unknown reason and in state of driver's license insurance
- Operating a CMV with improper CDL group
- Operating a CMV while possessing a fraudulent medical certificate
- Driver lacking valid license for type of vehicle being operated

- Driver operating a CMV without proper endorsement or in violation of restrictions
- Driving a CMV while disqualified. Suspended for safety-related or unknown reason and in the state of drivers license issuance
- Violating OOS order pursuant to 392.5(a)/(b) -- Alcohol Probation
  - No driver shall -
    - Use alcohol, as defined in 382.107 of this subchapter, or be under the influence of alcohol, within 4 hours before going on duty or operating, or having physical control of, a commercial motor vehicle; or
    - Use alcohol, be under the influence of alcohol, or have any measured alcohol concentration or detected presence of alcohol, while on duty, or operating, or in physical control of commercial motor vehicle; or
    - Be on duty or operate a commercial motor vehicle while the driver possesses wine of not less than one-half of one per centum of alcohol by volume, beer as defined in 26 U.S.C. 5052(a)(8), of such Code. However, this does not apply to possession of wine, beer, or distilled spirits which are:
      - Manifested and transported as part of a shipment; or
      - Possessed or used by bus passengers.
  - No motor carrier shall require or permit a driver to -
    - Violate any provision of paragraph (a) of this section; or
    - Be on duty or operate a commercial motor vehicle if, by the driver's general appearance or conduct or by other substantiating evidence, the driver appears to have used alcohol within the preceding four hours.

Drivers will be expected to converse with other company employees, our customers, and the general public. Therefore, Findlay Warehousing Co., Inc. requires all driver applicants to be able to read and speak English sufficiently to be able to perform all duties and functions of the job. (FMCSR Sec. 391.15 (b)(2)).

Driver applicants will also be required, because of experience, training, or both, to be able to:

- Safely operate a Findlay Warehousing Co., Inc. vehicle
- Determine and execute proper cargo securement procedures

## CDL DRIVER ROAD TEST AND CERTIFICATE

Findlay Warehousing Co., Inc. requires all driver applicants to successfully complete a road test examination conducted by a designated company 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 a minimum of 15 miles in length, and cover the following areas:

- A complete pre-trip inspection (as required by section 392.7)
- Coupling and uncoupling of units
- Placing the equipment in operation
- Operating the vehicle in traffic and while passing other vehicles
- Turning the vehicle
- Braking and slowing the vehicle by means other than braking
- Backing and parking the vehicle

Findlay Warehousing Co., Inc. 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 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 Findlay Warehousing Co., Inc. official who administered the test will complete a certificate of road test. The certificate will be placed in the driver's qualification file.

## MOTOR VEHICLE GUIDELINES & INSURABILITY

Findlay Warehousing Co., Inc. takes traffic violations very seriously. Below are guidelines to follow to keep you behind the wheel and working. Any driver who becomes uninsurable, as determined by the Company's insurance carrier, agrees to be reassigned to other duties, or may be terminated from employment at the company's option. *Be careful*, as we don't want to lose anyone because of traffic violations, accidents, or acts of unsafe driving.

The following represents guidelines for an unacceptable MVR. Violations count no matter when and in any type of vehicle. Each employee must be considered individually and in certain instances may require additional information and/or clarification.

Any MVR with one or more of the following serious violations within the last three years:

- Having six or more points on your record
- Driving under the influence of alcohol or drugs, and/or the refusal to take a blood alcohol test
- Any felony involving the use of a vehicle
- Vehicular homicide
- Fleeing or attempting to elude the police
- Failure to report an accident in which the driver was involved
- Reckless driving/racing
- Suspended/revoked license

Any MVR that contains more than four violations within the last three years or three or more violations within the past twelve months. These violations include but are not limited to the following:

- Speeding
- Improper or excessive lane changes
- Following too close
- A violation, rising in connection with a fatal accident
- Traffic control violations
- Seat belt violations
- At fault accidents

Federal Motor Carrier Safety Regulations Subpart C 383.31(b) "Notification Requirements"

Any CDL driver who is convicted of a violation in any type of motor vehicle shall notify his/her current employer of the conviction. The notification must be made within 30 days of the conviction. The notification must be made in writing and contain the following information. A copy of the citation could serve as notification.

- Driver's full name
- Driver's license number
- Date of conviction
- The specific criminal or other offense(s), serious traffic violation(s), and other violations(s) of State or Local law relating to motor vehicle traffic control, for which the person was convicted and any suspension, revocation, or cancellation of certain driving privileges which resulted from such conviction(s).
- Indication whether the violation was in a commercial motor vehicle
- Location of offense
- Driver's signature

## PHYSICAL EXAMINATION AND CERTIFICATE

Findlay Warehousing Co., Inc. requires driver applicants to be fully qualified physically to perform all duties and functions of driving and safely operating a commercial motor vehicle. Pre-employment Department of Transportation (DOT) physical examinations will be performed by a qualified medical examiner designated by the company.

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)

## EMPLOYEE SCHEDULE POLICY

After completing training, each employee will be assigned a schedule. Your schedule will remain in effect unless you are offered another schedule in which yourself, your supervisor and Human Resources will all need to agree and accept the scheduling change.

## CHANGING POSITIONS

Sometimes an occasion happens where a person wishes to change their status, or an opening comes available. If he/she is qualified to do the job, the person may request the change. After an interview, management may either allow or not allow the change. Salary negotiations would be done before final decision. Bumping would only be allowed if an opening occurred, or the employee's position is eliminated. Management makes the final decision.

## PERFORMANCE REVIEWS

Three months into being hired with Findlay Warehousing Co., Inc., an employee will be evaluated for performance and attendance. At each yearly mark, an employee will be evaluated for performance and attendance. The intention of performance reviews is to help the employee understand where their strengths and weaknesses are. A performance review may be used to coach an employee, to aid in working towards a promotion, or for wage increases.

## ENDING EMPLOYMENT

Employment at Findlay Warehousing Co., Inc. is not for a definite period of time. It is employment at-will, and any employee may be terminated by Findlay Warehousing Co., Inc. at any time for any reason not contrary to law. Employment contracts, agreements, or guarantees can only be made by an officer of the company and even then, the commitment would have to be in writing. You are free to terminate your employment at any time for any reason. If you resign, a letter of resignation should be submitted to your supervisor two weeks in advance of your termination date. This gives the company a chance to recruit and train a replacement. However, once notice has been given, the company may request you to leave prior to the notice date if it is in the best interest of the company.

In the event of a layoff or discharge, final checks will be available at the regularly scheduled pay date for that time period. All company property must be returned and outstanding debts satisfied prior to receipt of the final pay check.

## BREAK POLICY

Employees are allowed two 10-minute paid breaks and one 30-minute unpaid lunch. For any employee scheduled 12 hours, you are allowed three 10-minute paid breaks. Any employee working more than 8 hours unscheduled may report to their supervisor if they require a third 10-minute break and the supervisor will have to determine if that request is acceptable.

## CELL PHONES

Findlay Warehousing Co., Inc. has established a cell phone policy to help employees better utilize their time while on the job. Employees regardless of position may use their cell phones while on break or lunch however the following applies depending on your position.

### **Warehouseman**

Personal cell phone use is not permitted in the warehouse if you're a warehouseman. The Company provides Wi-Fi enabled smart phones which can be used to communicate with your team and upload pictures that you take when loading and unloading trailers. These phones are not meant to leave the property since they do not have cellular signal. Pictures should only be taken for business purposes. In the event pictures need sent to a customer, the office can be notified pictures were taken with a Wi-Fi phone so that the office can access those pictures from the cloud. Unless a supervisor gives you specific authorization for personal cell phone use for business purposes, your cell phone should be left in the break room or in your vehicle to prevent the urge of being on it.

### **Utility**

Personal cell phone use is not permitted in the warehouse if you're a utility employee. The Company provides Wi-Fi enabled smart phones which can be used to communicate with your team and upload pictures that you take when working around the warehouse. These phones are not meant to leave the property since they do not have cellular signal. Pictures should only be taken for business purposes. If your work requires you to be out of Wi-Fi range at the building you're working at, your supervisor may approve the use of your personal cell phone *only* for business use between you and your supervisor. Unless a supervisor gives you specific authorization for personal cell phone use for business purposes, your cell phone should be left in the break room or in your vehicle to prevent the urge of being on it.

### **Office**

The office staff may have their personal cell phones on them during their shift, at times it's easier to communicate via cell phone calling between the office and supervisors as needed. Office employees are not permitted to use their cell phones for personal use during their shift, unless on break.

### **CDL & NON-CDL Drivers**

Drivers may carry their personal cell phones on them at all times, most communication with dispatch is done via cell phone and messaging apps approved by dispatch. Drivers are not permitted to use their cell phones for personal use

while on duty unless stopped at a safe location or on break, calls and personal usage cannot interrupt their dispatch. When driving, drivers must use a hands-free Bluetooth device and calls should be kept to a minimum.

### **Management**

Supervisors and managers are permitted to have their personal or company assigned cell phones on them during their shift. Personal use should be kept to a minimum and not interfere with business or operations.

## **DRESS CODE**

Because you represent the Company while you're on the job, all employees are expected to always appear professional. Findlay Warehousing Co., Inc. does not allow employees to wear coats, shirts, or hats with objectionable/offensive language or with competitors' logos. Employees may not wear tank tops. Employees should not wear shorts or skirts above mid-thigh without approval. Drivers and mechanics are required to wear shoes - no sandals or shoes without backs. Employees are expected to maintain regular personal hygiene and grooming of hair when reporting to work or out on site with customers and the public.

## **COMPUTER AND USE OF TECHNOLOGY POLICY**

To maximize the benefits of our company's computer resources, and to minimize potential liability, Findlay Warehousing Co., Inc. has created the following policy. Users are required to always observe this policy.

The company employs a computer analyst/administrator who is charged with designing and maintaining our I.T. All computer issues/emergencies will be directed to the Findlay Warehousing Co., Inc. I.T. person through a company supervisor. All downloads and/or installation of applications/software must be pre-approved by the Findlay Warehousing Co., Inc. Management and then the I.T. personnel.

Violation of policy may result in disciplinary action. Violation of this policy will be taken seriously and may result in disciplinary action, including possible termination and civil and criminal liability.

### **Internet**

Use of computer network is for business purposes only. Access to the company computer network, including the e-mail system and Internet, is provided to assist you in performing your job.

No privacy should be expected. The entire computer network, including the hardware, software, and e-mail systems, belongs to Findlay Warehousing Co., Inc. You should consider any communication of information on the computer network to be public information. You should not have any expectation of privacy in anything you create, send, store, or receive on the computer network. Only files with a business purpose for Findlay Warehousing Co., Inc. should be stored on company computers.

Findlay Warehousing Co., Inc. can review any material on network. Without prior notice, Findlay Warehousing Co., Inc. has the right, but not the duty, to review any material created, stored, sent, or received on or through its computer network.

Network may not be used for prohibited activities. Use of Findlay Warehousing Co., Inc.'s computer network or resources for any of the following activities is strictly prohibited.

- Wasting computer resources, by among other things, sending mass mailings or chain letters, accessing the Internet for engaging in online instant messaging or chat groups, playing games, downloading music videos or otherwise creating unnecessary network traffic.
- Sending, receiving, downloading, displaying, printing, or otherwise disseminating material that is sexually explicit, profane, obscene, harassing, fraudulent, racially offensive, defamatory, or that is otherwise unlawful.
- Online gambling via the company computers is cause for immediate termination.
- Using or copying software in violation of a license agreement or copyright.
- Violating any state, federal, or international law.
- Accessing company Wi-Fi through your personal phone/tablet for purposes not related to company use without consent from management.

### **Passwords**

Use of personal passwords is prohibited. You are prohibited from using computer passwords not known to the company. Personal passwords should not be considered a guarantee of privacy.

### **Email**



Prior authorization is required for transmission of certain information. You should not place on the Internet or transmit by e-mail any information that is of a confidential, sensitive, or proprietary nature to Findlay Warehousing Co., Inc. without authorization from your supervisor.

All e-mail should be considered public information. The mere deletion of an e-mail message may not fully eliminate the message from the system. E-mail can be restored using special software. Do not write any e-mail messages that you would not want to become public information.

All messages are company records. The Company reserves the right to access and disclose all messages sent over its electronic mail system for any purpose. Company management also reserves the right to enter an employee's e-mail files at any time for any reason.

Employees are cautioned that e-mail is subject to disclosure in the unlikely event of litigation involving the company. Even deleting e-mail does not necessarily remove it permanently.

## SOCIAL MEDIA POLICY

### Policy

This policy provides guidance for employee use of social media, which should be broadly understood for purposes of this policy to include blogs, wikis, microblogs, message boards, chat rooms, electronic newsletters, online forums, social networking sites, and other sites and services that permit users to share information with others in a contemporaneous manner.

### Procedure

The following principles apply to professional use of social media on behalf of Findlay Warehousing as well as personal use of social media when referencing Findlay Warehousing:

- Employees need to know and adhere to the Findlay Warehousing's Code of Conduct, Employee Handbook, and other company policies when using social media in reference to Findlay Warehousing.
- Employees should be aware of the effect their actions may have on their images, as well as Findlay Warehousing images. The information that employees post or publish may be public information for a long time.
- Employees should be aware that Findlay Warehousing administration may observe content and information made available by employees through social media. Employees should use their best judgement in posting material that is harmful to Findlay Warehousing, its employees, or customers.
- Although not an exclusive list, some specific examples of prohibited social media conduct include posting commentary, content, or images that are defamatory, pornographic, proprietary, harassing, libellous, or that can create a hostile work environment.
- Employees are not to publish, post, or release any information that is considered confidential or not public. If there are questions about what is considered confidential, employees should check with the Human Resources Department and/or supervisor.
- Social media networks, blogs and other types of online content sometimes generate press and media attention or legal questions. Employees should refer these inquiries to authorized Findlay Warehousing management.

If employees encounter a situation while using a social medium that threatens to become antagonistic, employees should disengage from the dialogue in a polite manner and seek the advice of a supervisor.

Employees should get appropriate permission before you refer to or post images of current or former employees, members, vendors, or suppliers.

## FIREARMS

No employee shall carry or conceal a firearm on or in Company property, including without limitation the Company's facilities and/or vehicles, or during the course of employment.

## SMOKING

Findlay Warehousing Co., Inc. enforces a no smoking policy within all facilities. All facilities have designated smoking areas that employees can utilize, or employees may smoke in their vehicles. For any facility classified as Food Grade, tobacco of any type is not permitted within the walls of the warehouse. Tobacco products will either be left in the office or break areas, or employees may leave tobacco products in their vehicles.

# INJURY REPORTING AND RETURN-TO-WORK POLICY

Findlay Warehousing Co., Inc. has a high commitment to safety and injury prevention on the job. However, there may be times that injuries occur at the workplace or while a driver is on the road. In these instances, it's important that everyone follow the injury reporting procedures Findlay Warehousing Co., Inc. has established. These procedures are intended to ensure that an injured employee receives the proper medical attention as promptly as possible and that we are able to fully comply with worker's compensation regulations.

## **Injury Reporting Procedures**

### **Minor injuries:**

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

Such injuries should be reported to the employee's immediate supervisor or the Safety Director as soon as possible in person and on a work-related injury or illness form, but no later than 24 hours after the incident.

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

While injuries do occasionally happen, injuries that occur due to horseplay, misconduct or inappropriate behaviour will result in discipline for the involved employees. However, we do stress, Findlay Warehousing Co., Inc.'s first concern is its employees' safety, and no employee should be afraid of reporting an injury, no matter how it occurred. Injured employees who were following company safety rules will not be disciplined and the company will not tolerate any retaliation against the injured employee from any supervisor or co-worker.

Injuries that originally seem minor can evolve into larger medical problems - therefore it's crucial that Findlay Warehousing Co., Inc. has documentation of the original incident so that we may properly handle any worker's compensation claims or other issues that arise from the injury in a fair and timely manner. Additionally, multiple minor accidents or injuries can be a signal to the company that our safety practices in a particular area need improvement or that our employees need additional safety training.

### **More Serious Injuries**

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

If the injury does not necessitate emergency medical attention, but does require prompt attention from a medical professional, the injured employee should notify his or her immediate supervisor or the Safety Director. The employee will be allowed to go to the hospital/clinic or transportation will be arranged if the employee is unable to drive. If the injury requires emergency medical attention, either the injured person (if able) or a fellow employee should call 911.

Once emergency medical help is contacted, (or if emergency medical attention is not required) any employee witnessing the injury should try to render appropriate aid. Fellow employees should only perform actions that are immediately necessary to save the person's life or action that be performed with zero risk of aggravating the medical problem or causing further injury. UNDER NO CIRCUMSTANCES SHOULD EMPLOYEES TRY TO EXECUTE CPR OR GIVE MEDICAL AID WHICH THEY ARE NOT TRAINED TO PERFORM.

A driver who has a serious injury while on the road should seek appropriate medical attention at the nearest hospital. Once the injury or accident situation is medically under control, the injured person (if able) or a fellow employee should contact the Safety Director. Findlay Warehousing Co., Inc. will follow the same procedures for documenting the injury as explained in the minor injuries section of this policy.

## **Return-to-Work Program**

Findlay Warehousing Co., Inc. has a return-to-work program for employees recovering from illnesses or injuries sustained on the job. Employees who have physical limitation from an injury or illness will have their job duties modified, or will perform alternate duties, until they are able to perform their regular jobs.

The return-to-work program has several objectives.

First, the company's goal is to help its employees. The return-to-work program allows employees to get back on the job more quickly after an illness or injury. Returning to work as soon as possible:

- Minimizes the employee's loss of income
- Makes the transition back to regular duties easier, physically and psychologically

- Keeps up the employee's self-esteem because he/she can continue to perform useful and meaningful work
- Secondly, Findlay Warehousing Co., Inc. also benefits from the return-to-work program. An employee who continues to work, even in a restricted capacity, allows the company to continue utilizing the employee's skills and keeps up productivity.

Employees who are injured on the job and are receiving wage compensation will be required, if able, to participate in the return-to-work program.

### **Return-to-Work Procedures**

If an employee cannot work due to a job related injury or illness, he or she should contact the company on a regular basis (once per week) to keep the company up-to-date on his or her status.

When the time is appropriate (as determined by the company, the employee, and the medical professional treating the employee) for the person to resume some form of work, the company will request that a medical professional complete a return-to-work statement. The statement should summarize the employee's current physical abilities and what physical tasks the employee can or cannot perform.

Findlay Warehousing Co., Inc. does have the option of requiring the injured/ill employee to see a qualified medical professional specified by the company. The company may request this for the initial return-to-work examination/statement or anytime during the employee's recovery.

### **Return-to-Work Duties**

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

While the assigned work may be considered "light" in terms of its physical demands (if that is what is necessary based on the injury or illness), all return employees will be asked to perform tasks that are necessary and meaningful to Findlay Warehousing Co., Inc. operations.

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

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

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

### **Periodic Re-Evaluation**

Employees in the return-to-work program must be re-evaluated by a qualified medical professional every two weeks or on a schedule agreed to by the employee, medical professional and the Safety Director. After each re-evaluation, the medical professional should prepare a written statement concerning the employee's physical progress. The employee will submit this statement to Findlay Warehousing Co., Inc. As the employee's recovery continues, the job tasks may be reassigned to match the employee's increased ability. When the medical evaluation indicates the employee can resume his/her original job, the employee will do so.

### **Physician of Record (POR)**

- This is the doctor that you choose to handle your medical care when you have an injury at work.
- They order tests, perform procedures, etc. as needed. They may also refer you to a specialist if needed.
- We have arranged for you to receive your medical care at:

|                     |                     |
|---------------------|---------------------|
| Blanchard Valley    | Kirk Chiropractic   |
| 1900 S. Main Street | 116 W Lima St       |
| Findlay, Ohio 45840 | Findlay, Ohio 45840 |
| 419-423-4363        | 419-425-5121        |

**We do ensure the employee's right to choose his/her medical provider with any follow-up visit, however, we suggest you take advantage of the above facilities.**

## FAMILY MEDICAL LEAVE ACT

### **Purpose:**

FMLA provides eligible employees up to 12 weeks of unpaid leave to bond with a new child, to care for a family member with a serious health condition, or to obtain treatment and otherwise recover from an employee's own serious health condition. Employees taking FMLA are entitled to continued health insurance coverage and a guarantee, in most circumstances, of reinstatement to the same or equivalent position.

### **Eligibility:**

To be eligible for FMLA leave, an employee must have worked for the employer for at least twelve months and for at least 1,250 hours in the prior twelve months. The right to take leave under FMLA applies to male and female employees. However, a married couple employed by the same employer may be limited to a combined total twelve weeks leave if the leave is taken for the birth or care of a new-born, or a child placed for adoption or foster care, or to care for an employee's parent with a serious health condition. This limitation does not apply to time taken for the employee's own serious health condition or to care for a spouse or a child with a serious health condition.

### **Leave Available:**

Eligible employees are entitled to a total of twelve workweeks of FMLA leave per 12-month period. Intermittent or Reduced Leave - Leaves taken because of the birth, adoption, or placement of a child for foster care may be taken intermittently or on a reduced leave schedule only if the employer agrees. Employees must consult with the employer when planning medical treatments and make reasonable efforts to schedule the leave so as not to unduly disrupt the employer's operations. Employers may require the employee to transfer temporarily to an available alternative position with the equivalent pay and benefits that better accommodates recurring periods of leave.

### **Qualifying Reasons for Taking the Leave:**

An employee may take family and medical leave for the following reasons:

- Birth of a son or daughter
- Placement for adoption or foster care of a son or daughter with the employee
- Care of an employee's son, daughter, spouse, or parent who has a serious health condition
- An employee's own serious health condition preventing him or her from working

FMLA defines son or daughter broadly as biological, adopted, or foster child, a stepchild, a legal ward, or a child of a person standing in loco parentis (in place of a parent) who are under the age of 18 or over 18 and incapable of self-care. Parentis defined as a biological parent (not parent-in-law) or someone who stood in loco parentis when the employee was a child.

### **What Qualifies as a Serious Health Condition?**

A "serious health condition" is any illness, injury, impairment or physical or mental condition that involves (1) any period of incapacity or treatment in connection with or as a result of inpatient (i.e. overnight) care in a hospital, hospice or residential medical care facility; (2) continuing treatment by (or under the supervision of) a health care provider; or (3) continuing treatment by (or under the supervision of) health care provider for a chronic or long-term serious health condition or for pre-natal care; (4) permanent or long term incapacity due to a condition for which treatment may be ineffective (e.g. Alzheimer's, stroke, terminal disease); or (5) any period of absence to receive multiple treatments by or under the supervision of health care provider for restorative surgery after an injury or for a condition that would result in a period of incapacity of more than 3 days.

### **Employee's Notice Requirements:**

Where a necessity of leave is foreseeable, an employee must provide the employer at least 30 days' notice. If leave is required in less than 30 days or if the need for leave was not foreseeable, the notice must be provided as soon as practicable. "As soon as practicable" ordinarily means oral or written notice within 2 business days of when the employee learns of the need for the leave. When planning the medical treatment, an employee must consult with his or her employer and make a reasonable effort to schedule the leave so as not to unduly disrupt the employer's operations, subject to the approval of the health care provider.

### **Compensation During Leave:**

FMLA is unpaid. However, an eligible employee may elect, or an employer may require the substitution of any vacation leave, personal leave, or other accrued pay, except that an employer is not required to provide paid sick leave in any situation in which it would not normally provide paid leave. An employee remains responsible for, and must continue to pay, any share of their health care premiums during the FMLA leave.

If you have any questions regarding FMLA or this notice, please notify the Human Resources Department.

## SECURITY PLAN

***Findlay Warehousing Co., Inc. transports commodities that make us vulnerable as a venue for terrorist action. This plan is designed to address potential risks that include but are not limited to personnel security, unauthorized access, driver security, enroute security and action to take in the event of a security breach.***

Findlay Warehousing Co., Inc. will confirm information provided by job applicants. The company will do more detailed background checks for suspicious individuals. The Company will take into consideration the following indicators:

- Gaps in employment
- Frequent job shifts
- Citizenship
- Present and prior residence information
- Personal references
- Criminal history

#### **U.S. citizenship will be verified for all employees.**

For those employees who are not U.S. citizens, the Company will verify that all immigration papers are on file and properly documented.

The Company will make sure that interviews are conducted when hiring new drivers/employees. Information will be obtained that will help to appraise the personality, character, motivation, honesty, integrity, and reliability of the applicant and to judge his appearance and personal characteristics face to face.

Any information or suspicious activity discovered during the review will be reported to local authorities.

#### **Unauthorized Access**

Findlay Warehousing Co., Inc. will enforce a restricted visitation policy. Visitors and other non-employees will only be allowed to enter the facility when necessary. Visitors will not be allowed to meander alone. All employees are required to take notice and report any suspicious people or activities to management.

#### **Driver Security**

When transporting high value food products, or any high value commodities, the most effective defence is a driver who pays attention, keeps their eyes open and uses common sense. The following is a list of recommendations to help prevent a problem.

- Know or learn your route.
- Know your cargo.
- Check your load and make sure that what is in your vehicle is what is supposed to be there. If sealed, verify seal number.
- There is safety in motion. You must be cautious on the highway, but the most dangerous time is when you are stopped.
- Lock your vehicle every time you stop. Keep your trailer sealed, your cab locked, and your windows rolled up when you are parking or in slow moving traffic.
- Only stop in designated rest areas where there are other trucks parked.
- Try to avoid stopping at the same place every trip.
- Avoid stopping to help motorists in trouble...call for assistance instead.
- Be aware of your surroundings. Watch for suspicious vehicles at the pickup point or that follow you on the highway or anything that seems out of line. If you start to feel uncomfortable, get out and lock up if it is safe to do so, and call for help.
- Don't discuss your cargo or destination with anyone that does not have a need to know or on open CB channels.
- Always use common sense.
- If a hijack does occur, follow these precautions:
  - Do not resist.
  - Do whatever they say.
  - Report the incident to Findlay Warehousing Co., Inc. and law enforcement authorities IMMEDIATELY.
  - Get a good description of hijackers such as height, weight, colouring, and description of clothes; exact location where the incident occurred.

#### **En Route Security**

- Avoid high population centres, including downtown and/or metropolitan areas where possible.
- Use alternate routes that avoid high population areas.
- Avoid tunnels and bridges where possible.
- Park only in secure areas with ample lighting.
- Be alert when driving. Look for vehicles following you, especially if there are 3 or more people in the car. If you believe you are being followed, call your dispatcher or 911 immediately.

- When leaving the warehouse, be aware of any possible surveillance of the warehouse or your truck.
- When stopped at a traffic light or in traffic, be aware of anyone approaching your vehicle.
- Use seals to prevent and identify tampering.
- Do a quick walk-around to check your vehicle for foreign objects after all stops.

**Action to take in the event of a security breach**

Employees are expected to use common sense and good judgment when assessing the threat potential of any suspicious activity. Depending on the given situation, employees will be expected to report any observed suspicious activity to their immediate supervisor, next level manager, safety director or the local law enforcement or fire department.

In the event of an after-hours emergency, please contact your supervisor or the Safety Director immediately.

**Statement**

Findlay Warehousing Co., Inc. will provide a work environment that is reasonably free of hazards and threats of violence, which may cause damage to property or harm to people. All employees have a responsibility to themselves and to Findlay Warehousing Co., Inc. to observe and report any suspicious or unusual activity that threatens safety or security.

**SECURITY POLICY**

Findlay Warehousing Co., Inc. warehouses general commodities. This policy is designed to address potential risks that include but are not limited to: Visitors and Contractors, Building & Grounds, Employees, Action to be taken in event of Security issue.

**Visitors and Contractors**

- All visitors, drivers, vendors, and contractors must use the Main office entrance at any of our facilities.
- All visitors, drivers, vendors and contractors must report to the main office prior to initial entry.
- All visitors, vendors and contractors, must sign the "VISITOR SIGN IN LOG" and wear a "VISITOR" identification badge.
- No unauthorized personnel permitted in the warehouse without an escort.
- Visitors' vehicles are to be parked in the designated parking areas at each facility.
- All non-FWC drivers will be directed to the proper loading dock or staging area to be loaded or unloaded.
- Non-FWC drivers are to remain with the vehicle or in the area designated as "Drivers' waiting area" clearly marked in the main entrance area.
- There is no smoking permitted within the facility.
- Eating or drinking is only permitted within the designated "Drivers' waiting area"; all trash must be placed in the waste receptacles located in the "Drivers' waiting area".
- Firearms, weapons, or explosives of any type are strictly prohibited on Findlay Warehousing Co., Inc.'s property, facilities, or outside buildings.

**Building and Grounds**

- Dock doors will remain closed and locked when not in use.
- Ground level overhead doors will remain closed and locked when not in use.
- Outside security lights will be in use during night-time hours.
- All man doors not in use will remain closed and locked.

**Employees**

- Employees will park in the areas designated parking areas. Employees are responsible for locking and securing personal vehicles.
- Firearms, weapons, or explosives of any type are strictly prohibited on Findlay Warehousing Co., Inc.'s property, facilities, vehicles or outside buildings or facilities used, rented or frequented by FWC Personnel during the course of employment and otherwise.
- No unauthorized personnel permitted in the warehouse without an escort and prior permission from management.
- Employees will use the main entrance when reporting to and leaving work.
- Employees will clock in and out per company policy.
- No smoking, eating, or drinking is permitted in the Warehouses.
- All employees will wear the Company identification badges at all times when on duty.

**SECURITY PROCEDURES FOR FWC SATELLITE BUILDINGS**

**Visitors and Contractors**

- All visitors and contractors must use the Main office entrance at any of our facilities.

- All visitors and contractors must sign the "VISITOR SIGN IN LOG" and be issued a VISITOR identification badge to be worn at all times during the visit.
- The visitor may be required to provide their Company represented identification or personal ID.
- All visitors and contractors must be accompanied at all times by a Findlay Warehousing Co., Inc. representative.
- Upon completion of the visit, the visitor or contractor must report back to the Main office, sign out, and return the "VISITOR" identification badge.
- Firearms, weapons or explosives of any type are strictly prohibited on Findlay Warehousing Co., Inc.'s property, facilities or outside buildings.

### **Employees**

Only employees are permitted in any of the FWC satellite facilities. Employees are required to ensure the security of the facility by making sure that all the doors are locked at all times.

Firearms, weapons, or explosives of any type are strictly prohibited on Findlay Warehousing Co., Inc.'s property, facilities, vehicles or outside buildings or facilities used, rented or frequented by FWC Personnel during the course of employment and otherwise.

### **Non-FWC Drivers**

All non-FWC drivers must wait in their vehicles during loading and unloading. Upon completion of loading/unloading the FWC employee will bring the documentation outside for the driver's signature and will apply the seal to the trailer. Firearms, weapons, or explosives of any type are strictly prohibited on Findlay Warehousing Co., Inc. property, facilities or outside buildings.

### **ACTIONS TO TAKE IN EVENT OF SECURITY ISSUE**

Employees are expected to use common sense and good judgment when assessing the security issue or suspicious activity. Depending on the given situation, employees will be expected to report any observed suspicious activity to their immediate supervisor, next level manager or local law enforcement or fire department.

In the event of an after-hours emergency, please contact your supervisor or the Safety Director immediately.

## **ALCOHOL AND SUBSTANCE ABUSE**

### **Purpose**

Findlay Warehousing Co., Inc. requires employees to be free of substance and alcohol abuse. Consequently, the use of illegal drugs by employees is prohibited. Further, employees shall not use alcohol or engage in "prohibited conduct" as defined herein. The overall goal of this policy is to ensure a drug and alcohol-free transportation environment and to reduce accidents, injuries, and fatalities.

### **Consequences of Policy Violation**

Any employee who becomes unqualified or engages in prohibited conduct as set forth herein may be subject to termination of employment.

### **Prohibited Conduct**

The following shall be considered "prohibited conduct" for purposes of this policy:

- No employee shall report for duty or remain on duty while having an alcohol concentration of .04 or greater.
- No employee shall be on duty or operate a commercial motor vehicle while the employee possesses alcohol unless the alcohol is manifested and transported as part of a shipment.
- No employee shall use alcohol while performing safety-sensitive functions.
- No employee shall perform safety-sensitive functions within four (4) hours after using alcohol.
- No employee required to take a post-accident alcohol test shall use alcohol for eight (8) hours following the accident or until he or she undergoes a post-accident alcohol test, whichever occurs first.
- No employee shall refuse to submit a post-accident, random, reasonable suspicion, return-to-duty or follow-up alcohol or drug test.
- No employee shall remain employed if they refuse a drug screening or fail a drug screening, unless a medical review officer deems the test was a result of an approved prescription drug or any other form of false positive
- No employee shall report for duty or remain on duty when the employee uses any controlled substance, except when use is pursuant to the instructions of a physician who has advised the employee that the substance does not adversely affect the employee's ability to operate a commercial vehicle.
- If an employee engages in prohibited conduct, the employee is not qualified to drive a commercial motor vehicle and shall be immediately removed from service. The Company may, in its discretion, at the request of the employee, keep the employee's position open while such employee attempts to be re-qualified. The Company may also act against the employee up to and including termination.



### **Refusal to Test**

Refusal to submit to the types of drug and alcohol tests employed by the Company will be grounds for refusal to hire employee/applicants and to terminate employment of existing employee. A refusal to test is defined to be conduct that would obstruct the proper administration of a test. Refusing to sign step 2 of the alcohol form is considered a refusal to test. A delay in providing the urine, breath or saliva specimen could be considered a refusal. If an employee cannot provide a sufficient quantity of urine or breathe, a physician of the company's choice will evaluate him. If the physician cannot find a legitimate medical explanation for the inability to provide a specimen (either breathe or urine), it will be considered a refusal to test. In that circumstance the employee has violated one of the prohibitions of the regulations.

### **Types of Tests**

Pursuant to regulations promulgated by the Department of Transportation (DOT), the Company has implemented six circumstances for drug and alcohol testing: (1) pre-employment (drug testing only); (2) post-accident testing; (3) Random testing; (4) Reasonable suspicion testing; (5) Return-to-duty testing; and (6) Follow-up testing.

### **Pre-Employment Testing**

All applicants must submit to urine drug tests. A CDL driver/applicant is not required to submit to a urine test if (1) the Company can verify that the driver has participated in a valid drug testing program within the preceding thirty days; (2) while participating in that program, was either tested within the past six months or participated in a driver random selection program for the previous twelve months; and (3) no prior employer has knowledge that the driver violated any part of the regulations within the last six months.

### **Random Testing**

The Company conducts random drug and alcohol testing. The Company or its agent will submit all employees' names to a random selection system. The random selection system provides an equal chance for each employee to be selected each time a random selection occurs. Random selections will be reasonably spread throughout the year. The Company will drug test, at a minimum, 50 percent of the average number of employee positions in each calendar year or at a rate established by the Department of Transportation for the given year. The Company will select, at a minimum, 10 percent of the average number of employee positions in each calendar year for a random alcohol testing, or at the rate established by the DOT for the given year. Random selection, by its very nature, may result in employees being selected in successive selection or more than once in a calendar year. Alternatively, some employees may not be selected in a calendar year.

If an employee is selected at random, for either drug or alcohol testing, a Company official will notify the employee. Once notified, every action the employee takes must lead to a collection. If the employee engages in conduct that does not lead to a collection as soon as possible after notification, such conduct may be considered a refusal to test.

### **Post-Accident Testing**

An employee must submit to a drug and alcohol testing anytime he or she is involved in an accident where (1) employee or bystander is injured during the accident; (2) employee accident created a substantial amount of damage to either equipment, product and/or building structure; or (3) a fatality is involved; or (4) the employee receives a citation for a moving violation arising from the accident, and any party involved requires immediate treatment for an injury away from the accident scene, or if any vehicle involved incurs "disabling damage" (i.e. must be towed away). Following any accident, the employee must contact the Company as soon as possible. Anytime a post-accident drug or alcohol test is required; it must be performed as soon as possible following the accident. If no alcohol test can be made within eight hours, attempts to perform an alcohol test shall cease. If no urine collection can be obtained for purposes of post-accident testing within thirty-two hours, attempts to make such collection shall cease.

If federal, state, or local officials conduct breathe or blood tests for the use of alcohol and/or urine tests for the use of controlled substances following an accident, these tests may meet the requirements of this section, provided the tests conform to applicable federal, state, or local requirements. The Company may request testing documentation from such agencies and may ask the employee to sign a release allowing the Company to obtain such results.

In the event an employee is so seriously injured that the employee cannot provide a sample of urine, breath, or saliva at the time of the accident, the employee may provide necessary authorization for the Company to obtain hospital records or other documents that would indicate the presence of controlled substances or alcohol in the employee's system at the time of the accident.

### **Reasonable Suspicion Testing**

Reasonable suspicion for requiring an employee to submit to drug and/or alcohol testing shall be deemed to exist when an employee manifests physical behavioural symptoms or reactions commonly attributed to the use of controlled substances or alcohol. Such employee conduct must be witnessed by at least one supervisor trained in compliance with 382.603. Should a supervisor observe such symptoms or reaction, the employee must submit to testing.

### **Substance Abuse Evaluation, Return to Duty and Follow-up Testing**



Any employee who engages in prohibited conduct may be provided with the names, addresses and telephone numbers of qualified Substance Abuse Professionals (SAPs) pending upper management's discretion; each situation will be evaluated on a case-by-case basis. If the employee desires to become re-qualified, the employee must be evaluated and submit to any treatment the SAP prescribes. Following evaluation and treatment, if any, in order to become re-qualified, the employee must submit to and successfully complete return-to-duty drug and/or alcohol test. Such employee is also subject to follow-up testing. Follow-up testing is separate from and in addition to the Company's reasonable suspicion, post-accident, and random testing procedures. The schedule for follow-up testing shall be unannounced and in accordance with the instructions of the SAP. Follow-up testing may continue for a period of up to sixty months following the employee's return to duty. No fewer than six tests shall be performed in the first months of follow-up testing. The employee shall pay the costs of any SAP evaluation or prescribed treatment.

### Authorization for Previous Test Records

Within fourteen days of performing a safety-sensitive function. DOT regulations require that the Company obtain certain drug and alcohol testing records from employee's previous employers for the previous two years. The Company will verify that no prior employer of the employee has records indicating a violation of any DOT rules pertaining to controlled substance or alcohol use within the previous two years. As a condition to employment, the employee shall provide the Company with a written authorization for all previous employers with the past two years to release such drug and alcohol testing records, as the regulations require.

### Drug Urinalysis

Drug testing will be performed through urinalysis. Urinalysis will test for the presence of drugs and/or metabolites of the following controlled substances: (1) marijuana (2) opiates (3) Opioids (4) phencyclidine (PCP) (5) amphetamines and (6) cocaine.

| Initial test analyte                            | Initial test cutoff <sup>1</sup> | Confirmatory test analyte | Confirmatory test cutoff concentration |
|---|----------------------------------|---------------------------|--|
| Marijuana metabolites (THCA) <sup>2</sup> ..... | 50 ng/mL <sup>3</sup> .....      | THCA .....                | 15 ng/mL.                              |
| Cocaine metabolite (Benzoyllecgonine) ...       | 150 ng/mL <sup>3</sup> .....     | Benzoyllecgonine .....    | 100 ng/mL.                             |
| Codeine/ .....                                  | 2000 ng/mL .....                 | Codeine .....             | 2000 ng/mL.                            |
| Morphine .....                                  | 300 ng/mL .....                  | Morphine .....            | 2000 ng/mL.                            |
| Hydrocodone/ .....                              | 300 ng/mL .....                  | Hydrocodone .....         | 100 ng/mL.                             |
| Hydromorphone .....                             | 300 ng/mL .....                  | Hydromorphone .....       | 100 ng/mL.                             |
| Oxycodone/ .....                                | 100 ng/mL .....                  | Oxycodone .....           | 100 ng/mL.                             |
| Oxymorphone .....                               | 100 ng/mL .....                  | Oxymorphone .....         | 100 ng/mL.                             |
| 6-Acetylmorphine .....                          | 10 ng/mL .....                   | 6-Acetylmorphine .....    | 10 ng/mL.                              |
| Phencyclidine .....                             | 25 ng/mL .....                   | Phencyclidine .....       | 25 ng/mL.                              |
| Amphetamine/ .....                              | 500 ng/mL .....                  | Amphetamine .....         | 250 ng/mL.                             |
| Methamphetamine .....                           | 500 ng/mL .....                  | Methamphetamine .....     | 250 ng/mL.                             |
| MDMA <sup>4</sup> /MDA <sup>5</sup> .....       | 500 ng/mL .....                  | MDMA .....                | 250 ng/mL.                             |
|   |                                  | MDA .....                 | 250 ng/mL.                             |

The urinalysis procedure starts with the collection of a urine sample. Urine specimens will be submitted to an SAMHSA-certified laboratory for testing. As part of the collection process, the specimen provided will be split into two vials: a primary vial and a secondary vial. The SAMHSA-certified laboratory will perform initial screenings on all primary vials. In the event that the primary specimen tests positive, a conformation test of that specimen will be performed before being reported by the laboratory to the Medical Review Officer (MRO) as a positive.

The laboratory will report all laboratory results to an MRO designated by the Company. Before reporting a positive test result to the Company, the MRO will attempt to contact the employee to discuss the test result. If the MRO is unable to contact the employee directly, the MRO will contact the Company management official designated in advance by the Company, who shall, in turn, contact the employee and direct the employee to contact the MRO.

Upon being so directed, the employee shall contact the MRO immediately or, if after the MRO's business hours and the MRO sole discretion, a determination will be made as to whether a result is positive or negative. If, after failing to contact the MRO after five days or if the employee cannot be contacted at all within thirty days, the MRO may verify the test as a positive. After any positive verification the employee may petition the MRO to reopen the case for reconsideration.

Pursuant to DOT regulations, individual test results for driver/applicants and employees will be released to the Company and will be kept strictly confidential unless consent for the release of the test results has been obtained. Any individual who has submitted to drug testing in compliance with this policy is entitled to receive the results of such testing upon timely written request.

An individual testing positive may make a request of the MRO to have the secondary vile tested. A different SAMSHA-certified lab must test the secondary vial than tested the primary specimen. The request for testing of a secondary specimen is timely if it is made to the MRO within seventy-two hours of the individual being notified by the Company of a positive test result.

### **Alcohol Tests**

The Company will perform alcohol testing using a device that is on the National Highway Traffic Safety Administration's (NHTSA) Conforming Products List (CPL) and meets the DOT's testing requirements. This may be a breath testing device or a saliva-based testing device and may be provided through a vendor or agent. A technician who is certified will operate the device. The employee shall follow all instructions given by the alcohol technician. Any initial test indicating a blood alcohol concentration (BAC) of .02 or greater will be confirmed on an Evidential Breath Testing (EBT) device operated by a breath alcohol technician (BAT). The confirmation test will be performed no sooner than 15 minutes and no later than 30 minutes following the completion of the initial test. In the event the confirmation test indicates a BAC of .04 or greater are considered to have engaged in prohibited conduct, which may result in disciplinary action up to and including termination. All alcohol tests shall be performed just prior to, during, or just after duty.

### **Training**

The Company shall ensure supervisors designated to determine whether or not reasonable suspicion exists to require an employee to undergo testing under 382.307 receive at least 60 minutes of training on recognizing alcohol misuse and receive at least 60 minutes of training on recognizing controlled substances use. The training shall cover misuse and use of controlled substances.

### **Educational Materials**

The Company shall provide educational materials that explain the requirements of 382.601, consequences of violating the regulations, and the employer's policies and procedures with the respect to meeting these requirements. The materials supplied to employees may include information on additional employer policies with respect to the use or possession of alcohol or controlled substances, for example, the consequences for an employee found to have a specified alcohol or controlled substances level based on the employer's authority independent of 382.601. The Company shall ensure each employee is required to sign a statement certifying that he or she has received a copy of these materials described in 382.601.

This policy is not intended, nor should it be construed as a contract between the Company and the employee.

## **DISCIPLINARY PRACTICES AND DISPUTE RESOLUTION**

**Policy Description and Purpose:** This Employee Disciplinary Policy (the "Policy") is designed to explain how we handle employee misconduct or performance issues. This Policy describes our progressive action steps, including all consequences for employee actions. It is our desire to provide a process by which employees can correct any misconduct or improve work performance prior to more significant disciplinary action, up to and including termination.

Although we describe a progressive action policy here, we reserve the right to bypass certain steps or combine steps depending on the individual nature of each situation. All employee misconduct or performance issues are addressed on a case-by-case basis.

This Policy should not be read to create any new contractual rights between employer and employee. Nothing herein modifies the employment-at-will relationship between the parties.

**Scope:** This Policy applies to all employees of Findlay Warehousing Co., Inc.

**Policy-in-brief:** Findlay Warehousing Co., Inc. may impose discipline for workplace infractions, including employee misconduct and poor performance, in its sole and exclusive discretion. Disciplinary action may include, but is not limited to, verbal or written warnings, disciplinary meetings, corrective action, demotion, reassignment, and/or termination.

**Factors to be considered:** Findlay Warehousing Co., Inc. may consider any factor it deems appropriate when deciding on employee discipline. Some factors that may be considered include whether the misconduct or poor performance is a one-time infraction, or has been repeated, the employee's general work record, the employee's response to management, and the impact of the employee's behaviour on the Company at large.

**Disciplinary Guidelines:** Findlay Warehousing Co., Inc. wishes to provide guidelines for employee behaviour. Although it may be impossible or very difficult to outline standards of conduct for every possible situation, the Company has established a set of guidelines for unacceptable employee behaviour. The following list is not meant to be comprehensive, and the Company may discipline any employee for any action which may be deemed unacceptable. The following list of unacceptable conduct applies to all employees whenever they are conducting Company business both on and off Company premises.

- Unsatisfactory job performance or lack of professionalism
- Abusing, threatening violence, or engaging in violence with another employee or Company staff member
- General disorderly or dangerous conduct not becoming of a workplace, such as using abusing language, practical jokes, racial discrimination or any form of discrimination, or horseplay

- Fraud in any behaviour
- Deceit
- Loss of CDL when it's required for your position
- Major at-fault accident
- Stealing or other unauthorized possession of property
- The use or possession of illegal drugs including failing or refusing a drug test, possession, or use of weapons
- Failure to do assigned tasks
- Failure to comply with Company rules
- Excessive tardiness or absences
- Sexual harassment or any form of acts considered harassment
- Misusing confidential Company information
- Any other violation of a Company rule or policy

**Disciplinary Procedures:** The procedures outlined below will be applicable to most disciplinary situations. Employer also has the option to implement any other disciplinary method as described above, instead of or in addition to any of the steps below.

**Step 1 – Verbal warning:** At the first sign that there may be a performance issue or employee misconduct, the employee's immediate supervisor will issue a verbal warning to the employee. The verbal warning may take the form of an informal discussion. At this stage, the supervisor will ensure that the employee clearly understands the issue, as well as what needs to be done for the employee to resolve the issues.

The supervisor may create a written memorandum of the verbal meeting and request the employee's signature.

**Step 2 – Written warning:** If the situation has not been corrected to the supervisor's satisfaction, the next step is a written warning. This to be considered a formal notice to the employee and official documentation in the employee's file.

The employee's supervisor will meet with the employee again and may include upper management or human resources as well. During this meeting, the parties will review the situation, including the prior verbal warning the employee was given. The supervisor and upper management/HR will set new expectations for the employee and will clearly communicate the consequences of the employee not meeting such expectations.

**Step 3 – Termination:** If the employee has not corrected the issues the third and final step will involve termination. Prior to this stage, the issues created by the employee will likely have begun to affect the entirety of the workplace.

Management may choose to suspend instead of terminating the employee if an investigation is required, but this is management's sole and exclusive discretion. Suspensions may be without pay consistent with all local, state, and federal laws.

All procedures under this Policy will be conducted in a confidential manner to the extent possible.

**Illegal activity:** Any illegal behaviour is not subject to this Policy and will be grounds for immediate termination. Findlay Warehousing Co., Inc. may also report such activity to relevant law enforcement.

## DRIVER RESPONSIBILITIES (CDL & NON-CDL DRIVERS)

### Driver's Vehicle Inspection Procedures

Findlay Warehousing Co., Inc. is committed to following a daily inspection program. Federal Motor Carrier Safety Regulations require commercial motor vehicles to be inspected every day they are operated. Our daily inspection procedures will help avoid DOT penalties and provide a basis for a good inspection and maintenance program.

### Driver Pre-trip Inspection

Each driver must be satisfied that equipment is in proper working condition prior to operating a vehicle. This includes the following equipment:

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

- Wheels and rims
- Coupling devices
- Emergency equipment (including camera & spill kit)
- Report any recent damage to the power unit and/or trailer

Each driver must also be satisfied that cargo is properly distributed and secured.

Food grade shipments must be sealed and remain sealed unless authorized by the shipper, consignee or Findlay Warehousing Co., Inc. to break the seal.

The driver will also review the last completed Driver's Vehicle Inspection Report to verify that any needed repairs were made to the vehicle. If an authorized signature certifies that defects were corrected or that correction was unnecessary, the driver shall sign the third signature line of the form. If an authorized signature did not acknowledge the defects noted, the driver shall not drive the vehicle until the defects are handled appropriately.

#### **Driver Post-trip Inspection Report**

Each driver is required to complete a written report on each vehicle's condition at the end of their shift. A vehicle includes a power unit and trailer or trailers.

Findlay Warehousing Co., Inc. will use an inspection report form, which has an original and two copies:

- The vehicle must be identified on the report; regulations require that any defects in the equipment must be noted.
- The driver must also note any other defects which would affect the safe operation of the vehicle or result in its mechanical breakdown. The report must also indicate if no defects are found. The driver must sign the report.
- If safety related problems or defects are identified, the driver leaves the vehicle copy in the tractor and turns the original and maintenance copies into the office, along with the tractor keys.
- If no safety related problems or defects are found, the driver leaves the vehicle copy in the tractor and turns in the original and maintenance copy to the office.

#### **Driver P&D's (Pickup & Deliveries)**

Must have the following information:

- Your name
- Date
- Starting & ending time for your shift
- Tractor(s) number
- Tractor(s) mileage (beginning, updated at each stop and ending)
- Trailer number(s)
- Locations travelled
- Time arrived
- Time departed
- Indication of loaded, empty or bobtailing
- Time of lunch
- Proof of pre-trip
- Signature

#### **Count your Freight**

- Whenever possible sign you BOL's SL&C (Shipper Load & Count)
- When you are at a facility, loading or unloading, where you are allowed on the dock drivers are required to count and check the freight.

#### **Freight Bill**

Most shipments will require a Findlay Warehousing Co., Inc. freight bill along with the shipper's bill of lading paperwork. At times, there won't be a bill of lading (BOL). In those situations, you will need to fill out a freight bill for the consignee to sign upon receipt. A copy of the shipper's bill of lading must be turned in to the office for billing purposes.

Make sure the bills are correct for the load you were dispatched with.

- Pickup/Bill of Lading number
- Customer/Delivery Address
- Seal Number (check seal on trailer against the bills)
- If Hazmat, make sure the paperwork is in order, has an emergency contact phone number, freight is properly loaded, labelled and placards put on if required.
  - Hazmat bills must be kept on top of any other BOL

- Make sure you pull the correct trailer. Double-check your trailer number against your paperwork. When possible look into your trailer to make sure the freight matches your paperwork.
- If you experience an OS&D (Over, Short & Damage report) problem during delivery or pickup, call dispatch to report the problem and get instructions.
  - Before giving notations verify the shortage or damage. Notify Findlay Warehousing Co., Inc. dispatch of any notations being put on the bills
  - Complete the OS&D report and turn it in with your delivery.
  - In the OS&D remarks section indicate the following:
    - Short - Over – Damaged
    - Number of items involved
    - Item names and SKU numbers if available
    - If over or damaged, note if the items were kept or refused
    - Refused items in most cases will be returned to the facility and put on the dock

### **Logs**

- Logs are done electronically unless dispatch requests paper logs. When a paper log is requested, you will fill out a P&D (Pickup & Delivery) log, which will need turned into dispatch at the end of your shift.
- Logs will be audited and must be in compliance with Part 395 (HOS) of the FMCSR.

### **Equipment Reports (Pickup and Delivery)**

- Equipment Reports need to be completed and turned in daily.
  - These reports track your daily activity, for example: deliveries and location of trailers.
  - This is for local hourly runs.

### **Federal Motor Carrier Safety Regulations (FMCSR)**

- All drivers have been issued a copy of the FMCSR and are required to be familiar with its contents.

### **Securing Loads**

- The driver has the final responsibility to make sure the load he is pulling is secure. The only exception could be if you picked up a sealed load that you cannot inspect.

### **Scaling Trailers**

- When loading or picking up a trailer that is suspect of being overweight the driver needs to take responsibility of scaling that trailer and at a minimum call dispatch for direction.
- A driver that is negligent will be responsible for payment of the overload fine.

### **Dropping Trailers**

- When dropping trailers for loading or unloading the trailer axles need to be slid to the rear of the trailer.
- Whenever axles are slid the safety pin is to be put back in place to secure the tandem release arm.
- When dropping an empty trailer anywhere the driver is responsible to make sure it is swept and cleaned out.

### **Spills**

If you have a spill or release of material, do something quickly to minimize the loss. If it's a hazardous material do not attempt anything beyond your ability or knowledge.

- Every truck is equipped with a spill kit (putty and plugs) that can be used to block holes that will stop or slow leaks.
- Try to keep the release from flowing into a drain, ditch, or stream. When possible, watch where you stop or park your unit.
- Call your dispatcher!!
- Notify someone in charge of the property, local fire department or police.
- USE COMMON SENSE!

### **Driver Safety Rules and Policies**

Driving on company business and/or driving a company vehicle while under the influence of intoxicants and other drugs (which could impair driving ability) is forbidden and is sufficient cause for discipline, up to and including termination of employment.

Cell phone use while driving should be kept to a minimum. Drivers need to be aware the use of a cell phone is creating a distraction from safe driving and should adjust their usage, accordingly, including pulling off the road to continue/finish the conversation if needed. Whenever possible, drivers should complete calls while the vehicle is parked and/or use the phone in a "hands free" mode via a headset or Bluetooth. While driving, attention to the road and safety should always take precedence over conducting business over the phone and Bluetooth is the only acceptable option for cell phone use when behind the wheel.

No driver shall operate a company vehicle when his/her ability to do so safely has been impaired by illness, fatigue, injury, or prescription medication.

All drivers and passengers operating or riding in a company vehicle must wear seat belts, even if air bags are available.

No unauthorized personnel are allowed to ride in company vehicles.

Drivers are responsible for the security of company vehicles assigned to them. The vehicle engine must be shut off, ignition keys removed, and vehicle doors locked whenever the vehicle is left unattended.

Headlights shall be used 2 hours before sunset and until 2 hours after sunrise, or during inclement weather or at any time when 500 feet ahead of the vehicle cannot be clearly seen.

All state and local laws must be obeyed.

### **Defensive Driving Guidelines**

- Drivers are required to always maintain a safe following distance. Drivers should keep a two second interval between their vehicle and the vehicle immediately ahead. During slippery road conditions, the following distance should be increased to at least 4 seconds.
- Drivers must yield the right of way at all traffic control signals and signs requiring them to do so. Drivers should also be prepared to yield for safety's sake at any time. Pedestrians and bicycles in the roadway always have the right of way.
- Drivers must honour the posted speed limits. In adverse driving conditions, reduce speed to a safe operating speed that is consistent with the conditions of the road, weather, lighting, and volume of traffic. Tires can hydroplane on wet pavement at speeds as low as 40 mph.
- Radar Detectors are strictly prohibited in company vehicles. Drivers are to drive at the speed of traffic but never to exceed the posted speed limit.
- Turn signals must be used to show where you are heading, while going into traffic and before every turn or lane change.
- When passing or changing lanes, view the entire vehicle in your rear-view mirror before pulling back into that lane.
- Be alert of other vehicles, pedestrians, and bicycles when approaching intersections. Never speed through an intersection on a caution light. When the traffic light turns green, look both ways for oncoming traffic before proceeding.
- When waiting to make left turns, keep your wheels facing straight ahead. If rear-ended, you will not be pushed into the lane of oncoming traffic.
- When stopping behind another vehicle, leave enough space so you can see the rear wheels of the car in front. This allows room to go around the vehicle if necessary and may prevent you from being pushed into the car in front of you if you are rear-ended.
- Avoid backing where possible, but, when necessary, keep the distance travelled to a minimum and be particularly careful.

## **SAFETY RULES FOR TOWMOTOR & POWER VEHICLE OPERATORS (NON CDL)**

At the beginning of each shift check:

- Engine and radiator fluid levels on propane lifts
- Battery water level on electric lifts
- Brakes and brake fluid levels
- Steering and power steering levels
- Hydraulic operation and hydraulic levels
- General operation of the vehicle
- Complete Condition of equipment report, sign it and turn it in.

### **General Guidelines to Follow**

- Do not operate a faulty power vehicle. Report all faulty vehicle performances immediately.
- Only licensed operators are permitted to operate power vehicles.
- Operators are prohibited from carrying passengers unless an approved safety attachment is used with proper attachment points and fall protection
- Proceed through the warehouse aisles at a safe speed at all times.
- Reckless operation will not be permitted. Horseplay will not be tolerated.

- Power vehicles must be brought to a complete stop using the proper brakes before changing directions. Spinning the tires at any time is prohibited and will not be tolerated.
- Report all accidents to persons or damage to property IMMEDIATELY to your supervisor.
- Drive all power vehicles backwards when you have a load on your vehicle. (Except when stacking, unstacking, or loading).
- Drive fork trucks with mast tilted backwards approximately 10 degrees loaded or empty.
- Drive fork truck with forks 2" to 3" off floor empty or loaded.
- Always drive with the platens of truck in a lowered position, whether loaded or empty.
- Approach each intersection with caution, prepared to stop, if necessary, to prevent a collision, and always honk your horn.
- Pedestrians have the "right of way".
- It is the operator's responsibility to make sure all trailers or trucks are properly locked in, glad hand lock installed, and safety apparatus is working and properly used. If not, report it immediately to your supervisor or front office before entering the trailer with a power vehicle.
- When positioning a load, observe aisle lines, marked areas, fire doors and fire and safety equipment to ensure that none of these are covered or blocked or that it will create a safety hazard.
- Empty power vehicle should approach stacks of product with forks near the floor, then raise after positioned.
- When stacking, driver should approach stack carefully with load near the floor and mast tilted 10 degrees backwards. Raise the load only after getting into position.
- When stacking, never push units into those already stacked, just touching is required. When mast is tilted forward from 10 degrees to zero, units should be square and in place. (Pay special attention to bottom tier, this is where it all begins.)
- All material being conveyed must be properly stacked or safely secured. Do not attempt to lift an unsafe load.
- When leaving a power vehicle unattended, each driver is responsible to do the following:
  - Lower clamps or forks completely down to the floor without slamming the attachment or forks
  - Place all controls in neutral
  - Set emergency brake
  - Shut the power vehicle off
- At the end of each shift, close or shut off valve to propane gas tank on propane lifts
- Never refuel a power vehicle with the motor running.
- No smoking during the changing of propane gas bottles or in the propane gas bottle area.
- Operator restraint systems and seat belts must be used at all times.

The general guidelines to follow are written to abide by the requirements of Occupational Safety and Health Act (OSHA). Your complete cooperation in complying with the law is requested.

Any employee found violating safety rules or instructions will be subject to disciplinary action, ranging from reprimand to immediate discharge, depending on the seriousness of the offense in the judgment of the management.

## WHAT TO DO IN CASE OF AN ACCIDENT ON THE ROAD

FOLLOW THESE PROCEDURES TO FULFILL THE REQUIREMENTS OF THE LAW & FINDLAY WAREHOUSING CO., INC.

- **STAY CALM - PREVENT FURTHER DAMAGE OR INJURY!**
- *STOP YOUR VEHICLE* where it is clear, safe & legal
- USE WARNING DEVICES to prevent other accidents
- CALL POLICE & MEDICAL SERVICES as needed
- ASSESS MEDICAL NEEDS
- CALL FINDLAY WAREHOUSING CO., INC.
- GATHER INFORMATION names, license numbers, location, etc.
- TAKE PICTURES

### Stay Calm

No matter what kind of accident you are involved in, or come upon, you should remain as calm as possible, and use your good sense and judgment. If you fall apart in an emergency, you will not be able to help anyone.

### Stop Your Vehicle

Stop your vehicle immediately. You will be subject to legal penalties and company discipline if you do not stop after you are involved in an accident.



If it is safe and legal to do so, move your vehicle out of the travelled portion of the road. Remember that in some jurisdictions it is illegal to move the vehicle from the place where the accident happened. Before moving the vehicle involved in an accident, be sure it is legal to do so.

If you come upon an accident, stop your vehicle where it is clear, safe, and legal. Some jurisdictions have laws that require the first person to come upon an accident to stop and give assistance.

### **Use Warning Devices**

Do your best to prevent other accidents by:

- Turning on your four-way flashers or an initial warning signal
- Marking the scene of the accident with emergency warning devices

Every Findlay Warehousing Co., Inc. tractor is equipped with three bi-directional reflective triangles. When you perform your pre-trip inspection make sure you have these in your tractor. If you do not have them, you need to see the Safety Director about getting them.

### **Contact Appropriate Authorities**

Call the police, and if necessary, emergency medical services on your CB, cell phone or ask someone else to call. If absolutely necessary, go and make the call yourself if there is no one else to go. Generally speaking, it is best to remain on the scene.

### **Assess Medical Needs**

Most of what we have talked about here assumes that you are not one of the people injured in the accident. If you are injured, your responsibilities will obviously be diminished according to the severity of your injuries. Assuming you're able, check with everyone involved to assess injuries, it's helpful to be able to provide details to law enforcement and medical professionals when they arrive on scene.

You are not required to give medical attention, but help getting medical help on scene to anyone injured is part of your responsibility if you're able to call for help.

One thing to keep in mind, if you are injured, but still conscious, make sure Findlay Warehousing Co., Inc. is notified of the accident. Authorizing someone else to take care of this is your best thing to do.

### **Report to Findlay Warehousing Co., Inc.**

Report full details of the accident to Findlay Warehousing Co., Inc. as soon as possible. When you call in be specific and include as much information as possible:

- The exact location of the accident
- The precise time of the accident
- A reliable estimate of injury/damage
- A location where you may be reached
- The names/addresses of persons involved in the accident
- The names/addresses of insurance companies of all persons involved
- The type/make/model/color of vehicles involved in the accident

Reporting accident details fully and accurately is important so we are able to carry out the accident reporting responsibilities under the regulations.

### **Gather Information**

Try to get as much information on paper as possible. This includes the names of all people involved in the accident, as well as the names of all witnesses. Also get their addresses and phone numbers.

Make a quick diagram of where the vehicle occupants were seated and the direction of travel and the lane. Note the time of day, the date, and the weather conditions.

Ask to see the other drivers' licenses and write down the numbers; also indicate the vehicles' makes, color and license numbers. Exchange insurance information; try to get the agencies locations and phone numbers as well as the carriers.

Take pictures! Every tractor has a camera. Take as many pictures as necessary of the other units or property, our unit, and the scene.

Be courteous and helpful in providing information at the scene if requested by a law enforcement officer, *but do not admit guilt at the scene*. Deciding liability is not up to you.

### **Responsibility Lies in Two Areas**



- Dealing with specific problems at the accident scene.
- Gathering and reporting complete information on the accident to Findlay Warehousing Co., Inc. as quickly as possible.

Both elements are important and should be handled in as professional a manner as possible.

### **Post-Accident Testing**

Also, be aware of any post-accident drug and alcohol testing requirements that may apply. You will be required to be tested if:

- There is a fatality, no matter who is at fault.
- You are cited and any person is taken from the scene for treatment or any of the vehicles involved must be towed from the scene because they cannot be driven.

If testing must be done, we have to take care of it within time limits set by the DOT. For this reason, it is very important that you notify the Safety Department as soon as possible if you are involved in an accident.

## **EMPLOYEE SAFETY, INJURY, AND MEDICATION POLICY**

The Company's safety policy is based on our conviction that the wellbeing of our employees must be considered in all operations. You are our most important asset; it is our desire to send you home to your family whole and healthy. Safety in our Company is an important consideration.

Accidents, which result in the injury or death and loss of property, are preventable. It is Findlay Warehousing Company's policy to do everything reasonable to prevent injury to you, damage to property and protect the Company, the customer, and the public from the results of accidents.

When you or someone around you does not follow safety rules and procedures, an accident may occur. All actions or issues that could potentially pose a risk to the health or physical wellbeing of yourself or another employee must be reported to that employee's immediate supervisor. If management fails to adequately respond to the actions or issues, employees have the right to contact the Occupation Safety and Health Administration without employer retaliation. If you are injured at work, report the injury to your supervisor as soon as possible, regardless of whether medical attention is required at the time. You are required to complete an accident form at first availability after the occurrence.

When you are injured on the job you may be eligible for Worker's Compensation benefits. The Company provides Worker's Compensation benefit coverage to assure that medical cost reimbursement and income is available to you should you become injured at work and unable to work for a period of time. In addition, Findlay Warehousing Co., Inc. has established a return-to-work program for those employees' recovering from an on-the-job illness or injury. The return-to-work program allows employees with physical limitations from job related illnesses and injuries to have their jobs modified or to perform alternate duties based on their physical abilities/limitations, until they are able to perform their regular jobs or for a period of time determined by the company.

If an employee is taking a drug or medication, whether or not prescribed by the employee's physician, which may adversely affect that employee's ability to perform work in a safe productive manner, is required to report such use of medication to the Safety Director. Your supervisor along with management will determine whether the employee can remain at work or if any restrictions will be necessary.

## **ANTI-DISCRIMINATION POLICY**

Findlay Warehousing Co., Inc. shall not tolerate, under any circumstances, without exception, any form of discrimination based on race, creed, religion, color, age, disability, pregnancy, marital status, parental status, military status, domestic violence victim status, national origin, political affiliation, sex, predisposing genetic characteristics, and any other status protected by the law. This list is not exhaustive. Job promotions will be offered to employees based on merit, experience, and other job-related criteria. For qualified people with disabilities, Findlay Warehousing Co., Inc. will make every effort to provide reasonable workplace accommodations that comply with applicable laws. All employees, managers, stakeholders, and agents at Findlay Warehousing Inc., Co. will comply with these anti-discrimination policies. In some cases, local laws and regulations may provide greater protections than those described in this policy.

## **HARASSMENT POLICY**

Findlay Warehousing Co., Inc. has established a zero-tolerance standard for any type of harassment. As an equal opportunity employer, Findlay Warehousing Co., Inc. is committed to providing all its employees a workplace that is free of harassment.

This includes sexual harassment as well as verbal, physical, or psychological harassment due to race, color, religion, sex, national origin, disability, age, or any other protected characteristic under state or federal law.

Findlay Warehousing Co., Inc. shall follow all applicable state and federal (Equal Employment Opportunity Commission) laws in prohibiting sexual harassment or harassment of any type, in our workplace and while performing any and all work-related duties.

Findlay Warehousing Co., Inc. defines its workplace as not being limited to a Findlay Warehousing Co., Inc. Facility, and includes all company functions (on- and off-site), business travel, vendor locations, customer locations, and any other location where Findlay Warehousing Co., Inc. business is conducted.

The Policy applies to all Findlay Warehousing Co., Inc. employees and all non-employees with whom a Findlay Warehousing Co., Inc. employee may come into contact with the daily performance of his/her job, including:

- Customers
- Visitors
- Suppliers
- Vendors
- Contractors
- Temporary employees
- Other individuals

It is further understood that any of these individuals may be a victim or a violator under this Findlay Warehousing Co., Inc. policy.

#### **Definition of Harassment**

Findlay Warehousing Co., Inc. defines harassment as a single incident or a pattern of behaviour which entails verbal, physical or psychological abuse of any nature.

#### **Conduct and Behaviour Which May be Considered Harassment**

Findlay Warehousing Co., Inc. is committed to creating an environment that is free of all forms of harassment - both verbal and nonverbal. Language and personal behaviour that could be considered harassment (other than sexual) may include:

##### Verbal Harassment

- Telling offensive (ethnic or religious) jokes, taunting or mimicking others.
- Making disparaging or derogatory comments or remarks that perpetuates stereotypes about a protected individual group.
- Directing denigrating slurs, epithets, insults or comments towards a protected individual or group.
- Making verbal threats or physical violence, intimidating other employees, or making harassing phone calls.
- Nonverbal Harassment.
- Displaying offensive, derogatory, inappropriate, or other graphic materials in common areas.
- Segregating or discrimination against an employee or co-worker.
- Physically assaulting, abusing, or threatening specific employees or co-workers.

## **SEXUAL HARASSMENT POLICY**

**Policy Description and Purpose:** Findlay Warehousing Co., Inc. aims to protect its employees from unwanted sexual advances and to provide guidelines on how to report incidents in the event an employee feels they were sexually harassed. This policy will explain how we handle claims, how anyone found guilty is punished and how victims will be helped by the company to recover from sexual harassment.

We won't tolerate sexual harassment in our workplace in any shape or form. Our culture is based on mutual respect and collaboration. Sexual harassment is a serious violation of those principles.

**Scope:** This policy applies to every person in our company regardless of gender, sexual orientation, level, function, seniority, status, or other protected characteristics. We are all obliged to comply with this policy.

The Company won't tolerate sexual harassment from inside or outside of the company. Employees, investors, contractors, customers, and everyone interacting with our company are covered by the present policy. In the event someone outside the company sexually harasses one of our employees, the employee will follow the same guidelines to report the incident stated in this policy for reporting a Findlay Warehousing Co., Inc. employee for sexual harassment.

**Definition and Examples:** According to the EEOC's guidelines, sexual harassment is a form of discrimination prohibited by Title VII of the Civil Rights Act. It can include several forms, including unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature (including same-sex harassment).

#### **Conduct and Behaviour Which May be Considered Sexual Harassment**

Findlay Warehousing Co., Inc. expects each employee to exercise sound personal judgment concerning the possible effects on others of his/her actions - specifically but not limited to personal behaviour and language.

Inappropriate, unacceptable, or offensive behaviour and language that could be considered sexual harassment may include:

- Unwelcome or unwanted sexual advances. This means patting, pinching, hugging, cornering, kissing, fondling, brushing up against, or any other similar physical contact considered unacceptable by another individual.
- Requests or demands for sexual favours. This includes subtle or blatant expectations, pressures, or request for any type of sexual favour accompanied by an implied or stated promise of preferential treatment or negative consequences concerning one's employment status or advancement opportunity.
- Verbal abuse (even if intended as kidding) that is of a sexual nature and considered unacceptable or offensive by another individual. This includes graphic comments about an individual's body or appearance, sexually degrading words to describe an individual, or telling sexually graphic jokes or stories that may be offensive to others.
- Engaging in unwanted sexually oriented conduct with someone that interferes with his/her work activities or performance.
- Creating a hostile, offensive, or intimidating work environment. This includes the display in the workplace of sexually suggestive objectives, materials, or pictures.

#### **Conduct and Behaviour Which May Not be Considered Sexual Harassment**

Normal, courteous, mutually respectful, non-coercive conversations and interactions between employees, customers, visitors, suppliers, vendors, contractors, temporary employees, and/or other individuals that are acceptable to both parties may not be considered sexual harassment.

Isolated comments of a sexual nature, while possibly objectionable, are not necessarily sexual harassment.

Furthermore, as a general rule, conduct between consenting parties, or actions arising out of current personal or social relationships where there is not coercion involved, may not be viewed as sexual harassment.

## **REPORTING HARASSMENT**

Any Findlay Warehousing Co., Inc. employee believing he/she has been the victim of sexual or other harassment should report the complaint/incident or alleged discrimination without fear of retaliation, no matter how minor the complaint/incident might seem.

Findlay Warehousing Co., Inc. encourages all employees to report any sexual or other harassment situations as promptly as possible.

The report should be made to:

- Employee's immediate supervisor
- Safety Director if the complaint involves the employee's immediate supervisor
- Any management individual with whom the employee is comfortable

The Findlay Warehousing Co., Inc. employee will be required to file a written complaint. The complaint forms shall be available at the Safety Directors office and shall, at a minimum, include the following information:

- Name of filing employee
- Name of accused employee
- Adequate description, including date and time of action complained of
- Filing employee's signature

#### **Investigation Procedures**

All complaints will be promptly and thoroughly investigated by a management team, who will conduct a fair and impartial investigation. Interim measures may be taken pending full investigation and resolution of the complaint, such as temporary reassignments or separating the alleged violator and the complainant.

The investigators shall discuss the complaint with both parties and shall question all employees who may have knowledge of either the actual incident or similar situations. The complaint, investigative steps, findings, and disposition shall be documented.

Complaints shall remain confidential except where circumstances arise in which others may have a need to know. When the investigation is complete, the investigators will decide on appropriate corrective or disciplinary action. Results of the investigation and corrective or disciplinary action shall be communicated to the individual who filed the complaint.

If the investigation reveals that an employee has engaged in harassment, that individual shall be subject to disciplinary action up to and including termination.

**Other Related Information**

Any Findlay Warehousing Co., Inc. employee who presents a knowingly false or frivolous claim that is proven to be untrue could be subject to civil repercussions from the falsely accused party and/or termination of his/her employment with Findlay Warehousing Co., Inc.

This policy is subject to change, without notice, in Findlay Warehousing Co., Inc.'s sole discretion. It is the intent of Findlay Warehousing Co., Inc. that its policy complies with all federal, state, or local laws governing discrimination or harassment in the workplace, and that this policy is subject to change, without notice, should federal, state, or local law so require.

**Final Recourse**

Findlay Warehousing Co., Inc. employees are entitled to file complaints of harassment with the Equal Employment Opportunity Commission or other appropriate government agency. However, the company believes any and all complaints can be resolved internally.

# INDEX

|  |    |   |    |
|--|----|---|----|
| 401K Plan.....   | 6  | Findlay City Tax Refund Filing.....                               | 7  |
| Absence.....   | 7  | Firearms.....   | 17 |
| Approved Absence.....  | 8  | Funeral Leave.....  | 6  |
| Approved Absence Examples.....   | 8  | Guiding Values and History.....                                   | 4  |
| Approved Unpaid Time Off Requirements.....                                     | 8  | Harassment Policy.....  | 34 |
| Calling Off or Calling In.....   | 7  | Index.....  | 37 |
| Missed Clock.....  | 9  | Injury Reporting and Return-to-Work Policy.....                   | 17 |
| No Call / No Show.....   | 9  | Insurance.....  | 6  |
| Sick Days.....   | 9  | Introductory Period.....  | 6  |
| Tardy.....   | 9  | Jury Duty Leave.....  | 6  |
| Unapproved Absence.....  | 8  | License Requirements.....   | 11 |
| Unexcused Absence Examples.....  | 9  | Mission Statement.....  | 3  |
| Alcohol and Substance Abuse.....   | 23 | Motor Vehicle Guidelines & Insurability.....                      | 22 |
| Alcohol Tests.....   | 26 | Orientation and On-Boarding.....                                  | 11 |
| Anti-Discrimination Policy.....  | 33 | Overtime.....   | 5  |
| Application for employment.....  | 10 | Paid Holidays.....  | 5  |
| Attendance and Absenteeism Policy.....   | 7  | Paid Time Off.....  | 5  |
| Bereavement Leave.....   | 9  | Performance Reviews.....  | 14 |
| Funeral Leave (Non Bereavement).....   | 9  | Personnel Files and Privacy Policy.....                           | 4  |
| Board of Directors and Ownership Information.....                              | 4  | Physical Examination and Certificate.....                         | 13 |
| Break Policy.....  | 14 | Post-Accident Testing.....  | 24 |
| CDL Driver Application.....  | 10 | Pre-Employment Drug and Alcohol.....                              | 10 |
| CDL Driver Road Test and Certificate.....                                      | 13 | Pre-Employment Testing.....                                       | 24 |
| Cell Phones.....   | 14 | Purpose of this Document.....                                     | 3  |
| Changing Positions.....  | 14 | Random Testing.....   | 24 |
| Compensation Policy and Payroll.....   | 7  | Reasonable Suspicion Testing.....                                 | 24 |
| Computer and Use of Technology Policy.....                                     | 15 | Regular Full-time Employees.....                                  | 6  |
| Confidentiality Agreement.....   | 4  | Regular Part-time Employees.....                                  | 6  |
| Disciplinary Practices and Dispute Resolution.....                             | 26 | Reporting Harassment.....   | 35 |
| Dress Code.....  | 15 | Safety Rules for Towmotor & Power Vehicle Operators (NON CDL) ... | 30 |
| Driver Acceptability Criteria & MVR Guidelines (CDL & NON-CDL<br>Drivers)..... | 11 | Security Plan.....  | 20 |
| Driver Responsibilities (CDL & NON-CDL Drivers).....                           | 27 | Security Policy.....  | 21 |
| Driving Qualifications.....  | 11 | Sexual Harassment Policy.....                                     | 34 |
| Drug Urinalysis.....   | 25 | Shift Premiums.....   | 5  |
| Employee Benefits.....   | 5  | Smoking.....  | 17 |
| Employee Safety, Injury, and Medication Policy.....                            | 33 | Social Media Policy.....  | 16 |
| Employee Schedule Policy.....  | 14 | Standards of Conduct.....   | 4  |
| Employment Status.....   | 6  | Temporary Employees.....  | 6  |
| Ending Employment.....   | 14 | Unpaid Time Off.....  | 5  |
| Equal Opportunity & At-Will Employment.....                                    | 4  | Vision Statement and Organizational Culture.....                  | 3  |
| Exempt Employees.....  | 6  | Welcome.....  | 3  |
| Family Medical Leave Act (FMLA).....   | 19 | What to do in Case of an Accident on the Road.....                | 31 |

# CONFIDENTIALITY AGREEMENT

In the course of your work at Findlay Warehousing Company you may have access to information about our business, our customers, and our employees, which is confidential. Our customers give us information about them in the strictest confidence and expect this confidence will be respected. This information should not be discussed with anyone, except in connection with your work. Additionally, any company or employee information should not be discussed with anyone, except in connection with your work. Records relating to employees or customers shall not be released without prior approval from management. Disregard for this policy may result in discipline, up to and including discharge.

| EMPLOYEE SIGNATURE | DATE |
|--------------------|------|
|                    |      |

## ACKNOWLEDGEMENT OF HANDBOOK WITH SIGNATURE

The signature below serves to verify the employee has received, has read, and understands the Employee Handbook.

| EMPLOYEE SIGNATURE | DATE |
|--------------------|------|
|                    |      |
| MANAGER SIGNATURE  | DATE |
|                    |      |