

Ride the Ducks of Seattle Safety Management Plan: Section 2

Additional Policy Detail & Information

In Support of Report Recommendations

**Ride The Ducks of Seattle
WUTC Compliance Review
Audit Date: 9/28/15**

Compliance Team Job Descriptions

Reference: RTDS Standards, Policy and Procedures (All Employees), Chapter 3, Section 3.4

Director of Operations & Compliance Officer: Ryan Johnson

The Director of Operations and Compliance Officer for RTDS is responsible for ensuring his own safety, the safety of others, and protecting the environment. Additionally, the Director of Operations is responsible for ensuring RTDS and its employees are compliant with the safety guidelines set forth by the Federal Motor Carrier Safety Administration (FMCSA), US Department of Transportation (USDOT), and the United States Coast Guard (USCG). The Director of Operations works with the Director of Safety in managing the RTDS Code of Compliance and Safety Management System on behalf of RTDS. The duties of the Director of Operations include, but are not limited to:

- Maintaining Driver Qualification Files and monitoring FMCSA and USCG regulation compliance on a company level.
- Audit and review of safety procedures.
- Managing the daily dispatch of Ducks.
- Managing and directing the Director of Safety and other operations staff.
- Partnering with the General Manager, Fleet Maintenance Manager, and office personnel to ensure all company goals are accomplished.

It is the Director of Operations' responsibility to be up-to-date on all certifications required by the DOT, including but not limited to: at a minimum a Washington state commercial driver's license (Class C) with a passenger endorsement (P2). This is a safety-sensitive position which requires the employee to participate in the RTDS random drug and alcohol testing program and that the employee must maintain a current DOT Medical Certification. The ability to lift up to twenty-five (25) pounds is required.

Director of Safety & Assistant Compliance Officer: Moti Krauthamer

The Director of Safety for RTDS is Seattle is responsible for ensuring his own safety, the safety of others, and protecting the environment. As the safety oversight manager for all employees at RTDS, the #1 goal and purpose of the Director of Safety shall be to protect and maintain the health and wellbeing of the RTDS staff, our guests, the general public, and the environment. Additionally, the Director of Safety is responsible for following the safety guidelines set forth by the Federal Motor Carrier Safety Administration (FMCSA), US Department of Transportation (USDOT), and the United States Coast Guard (USCG). The Director of Safety works with the Director of Operations in managing the RTDS Code of Compliance and Safety Management System on behalf of RTDS. The duties of the Director of Safety include, but are not limited to:

- Assisting the Director of Operations in maintaining and auditing Driver Qualification files and monitoring FMCSA and USCG compliance.
- Receiving and managing customer and public safety comments or concerns.
- Oversight and management of the Captain and other safety sensitive employee training programs.
- Partnering with the Fleet Maintenance Manager and Customer Service Manager to ensure all company safety goals are accomplished.

It is the Director of Safety's responsibility to be up-to-date on all certifications required by the DOT and USCG including but not limited to: a USCG Master's License of at least twenty-five (25) tons and at a Washington state commercial driver's license (Class C) with a passenger endorsement (P2). This is a safety-sensitive position which requires the employee to participate in the RTDS random drug and alcohol testing program and that the employee must maintain a current DOT Medical Certification. The ability to lift up to twenty-five (25) pounds is required.

Finance Manager, Assistant Compliance Officer & DER: Margaret Singbeil

The Finance Manager is responsible for ensuring her own safety, the safety of others, and protecting the environment. The Finance Manager is responsible for processing Accounts Payable/Receivable, budgeting, tax estimations, and all required financial and government agency regulated reporting. This person is also the DER for the DOT, USCG, and non-DOT Safety Sensitive drug testing programs. They facilitate qualifying paperwork, testing, and result notification for all employees. Their duties also include assistance with payroll, HR and Driver Qualification File Auditing, and Information Technology.

Fleet Maintenance Manager: Joe M. Hatten

The Fleet Maintenance Manager is responsible for ensuring his own safety, the safety of others, and protecting the environment. Additionally, Fleet Maintenance Manager is responsible for following the safety guidelines set forth by the Federal Motor Carrier Safety Administration (FMCSA), US Department of Transportation (USDOT), and the United States Coast Guard (USCG). The duties of the Fleet Maintenance Manager include, but are not limited to:

- Managing a team of mechanics and shop helpers to keep vehicles in safe, working condition at all times.
- Directing the team to successfully complete preventative and annual maintenance.
- Ensure pre-trip and post-trip daily inspections and reports are accurately completed before vehicles are permitted to carry passengers.

The Fleet Maintenance Manager is also responsible for maintaining accurate and complete files on vehicles and work completed including Daily Vehicle Inspection Reports, Periodic Inspections, scheduled and un-scheduled maintenance work orders, other vehicle and maintenance records, and an accurate tool and parts inventory. The Fleet Maintenance Manager is responsible for creating and working within the guidelines of a budget and partnering with the Finance Manager to ensure invoices are paid accurately. The Fleet Maintenance Manager works closely with the Director of Operations and Driver/Captain staff to ensure the highest level of safety and reports directly to the General Manager. This is a safety-sensitive position which requires the employee to participate in the RTDS random drug and alcohol testing program and that the employee must maintain a current DOT Medical Certification. The ability to lift up to twenty-five (25) pounds is required.

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RTDS Safety Expectations

Reference: RTDS Standards, Policy and Procedures (All Employees)

- Chapter 1: Company Culture and Code of Conduct
- Chapter 2: Safety and Environmental Protection Policy
- Chapter 5: Ride the Ducks of Seattle Policy and Procedure Manual
 - Section 5.5.6: Passenger and Public Complaints
 - Section 5.7.2: Disciplinary Action
 - Section 5.7.3: Employment Termination
- Chapter 8: Company Verification and Review

Additional Statement and Overview:

Ride the Ducks of Seattle believes that safe practices do not just come from having a Code of Conduct or a mission statement outlining them. At Ride the Ducks of Seattle, “Be Safe” means being responsible in understanding and practicing the prescribed rules and regulations of operating, being honest, listening and learning from the experiences of others and sharing your own, and from providing consistent set company standards and corrective action plans to protect life, limb, and the environment.

Education is a key component to the Ride the Ducks of Seattle Safety and Compliance Program. All employees are required to be trained upon initial hire and to participate in ongoing continued education programs. Whether it be a discussion on updated inspection procedures or an evacuation plan for a natural disaster. Ride the Ducks of Seattle offers a system of training that includes verbal, visual, and hands on learning that requires and promotes participation of its employees.

Operational safety does not come without review and self-assessment. Ride the Ducks of Seattle has successfully implemented several verification and review procedures that allow safety to be examined across all departments. Audit and review of processes and employee practice are carried out on assigned timetables with honesty and education being the key contributing factors to ensuring compliance and employee education.

Finally, the expectation of safety is non-negotiable for employees of Ride the Ducks of Seattle. It is the responsibility of every employee to follow safety directives developed and implemented in accordance with Company philosophy, expectations, and compliance with FMCSA, USCG and other regulatory agency requirements. Ride the Ducks promotes safety as our most important core value because we have long recognized that safe and compliant operations are a foundation to continued success in serving our customers and our community.

Additional Material from RTDS Employee Policy and Procedure Manuals

Provided in the pages to follow include the first two Chapters, parts of Chapter 5, and Chapter 8 of the Ride the Ducks of Seattle Code of Compliance Manual, Volume 1 for all employees. This manual includes company expectations for all personnel with regard to general safety, use of controlled substances and alcohol, and expectations for verification and review. Additional Code of Compliance Volumes contain specific instruction for vehicle inspection and operation, maintenance, emergency procedures, reporting processes, employee training, and verification and review standards.

Chapter 1 – Company Culture and Code of Conduct

1.1 Introduction

This manual is to help our employees better understand their roles and operational responsibilities while employed at Ride the Ducks of Seattle (RTDS) as well as provide a broader understanding of each department's role in overall operations. Whether you are one of our Drivers/Captains, a Deckhand/Tour Guide, a Maintenance Technician, a member of our sales staff, or part of our corporate office, you are considered an important and integral member of the RTDS family.

Upon incorporation by reference, all changes, additions, deletions or other alternations and amendments to this document require preoperative approval by the RTDS Director of Operations, General Manager or Finance Manager. This manual is the exclusive property of Ride the Ducks of Seattle. It should not be removed from any Ride the Ducks of Seattle vehicles or Ride the Ducks of Seattle premises, nor should any of its contents be copied or conveyed to anyone not employed by RTDS without the express permission of the Director of Operations, General Manager or Finance Manager.

Invariably, situations not covered by a rule or standard procedure sometimes arise. In such cases, employees are to use good judgment. Protect self and others first, then property; seek to deescalate and manage situations. In the interest of safety and guest service, employees are responsible for having a complete copy of applicable RTDS Code of Compliance Volumes related to their department, becoming thoroughly familiar with the rules and procedures and following prescribed rules. When necessary, seek clarification from a supervisor or the Director of Operations.

A violation of any part of these rules and/or failure to exercise good judgment may result in disciplinary action appropriate to the nature of the offense. Ignorance of rules, procedures and/or special instructions does not excuse negligence or omission of duty. When necessary, employees must seek the guidance of supervisory personnel regarding clarification of any rule or operating procedure.

1.2 Purpose

The purpose of this RTDS Code of Compliance Manual is to describe the companies' policy, procedure, development, implementation, and ongoing maintenance of the Safety Management Systems at RTDS.

1.3 Mission Statement

Deliver safe and wholesome family entertainment that will be enjoyed by guests of all ages.

Our mission statement highlights RTDS focus on safety and goal to create lasting memories for our guests and employees alike. We want to be a visitor's first stop for fun and information as well as providing an experience that they will never forget.

1.4 Core Values

Every company has a unique culture and anyone who has worked at a few different places recognizes that there are diverse ways of doing business in different organizations and industries. We believe that a positive and effective company culture is an important asset in promoting safety. This culture must be preserved, maintained, and supported by everyone within our organization.

We strive to provide a continually improving business, employee environment and safe operation. Our guests and employees are the most important people in our working world and we must deliver a safe, respectful, courteous and pleasant environment for all those that we come into contact with on a daily basis. RTDS is a family run business that expects everyone to treat fellow employees, guests and vendors like they would treat their own family.

1.5 Code of Con'DUCK't

Ride the Ducks of Seattle asks that all employees honor our code of conduct. You'll see the Code of Con'DUCK't posted throughout the workplace and it will be referred to frequently. If you have any questions, please ask.

Be Safe: "A chain is only as strong as its weakest link." – Proverb

- Safety is the #1 priority at Ride the Ducks of Seattle and we are proud of our safety record. Be mindful and aware of your surroundings and follow safety policy. Protect people, property, and the environment from harm. If you see a safety issue or have a safety concern, let a supervisor know.

Be Responsible: "Responsibility is the price of freedom." -- Elbert Hubbard

- The responsibility of providing safe operations and of solving problems belongs to everyone. We are collectively and individually responsible for serving our guests and community, and for creating a safe, courteous, and professional work environment.

Be Honest: "Integrity is telling myself the truth. And honesty is telling the truth to other people." -- Spencer Johnson

- We ask that you always speak the truth. If you have concerns or if you feel like you may have messed up, be honest. Have integrity and we'll do the same for you.



Chapter 2 – Safety and Environmental Protection Policy

2.1 Introduction

Safety and environmental protection is of critical importance at RTDS. This company is committed to conducting our business in a manner to ensure safe operations, prevention of human injury or loss of life, and avoidance of damage to property and the environment while on land or at sea. RTDS seeks to develop, implement, and maintain standards of safety and environmental protection in line with what is considered reasonable and practical.

2.2 Policy Objectives

The specific objectives of the RTDS safety and environmental protection policy are to:

- Provide for safe practices in all RTDS operations
- List safeguards against all identified risks
- Provide a safe working environment
- Prevent human injury or loss of life
- Avoid damage to property and the environment, in particular, the marine environment
- Continue to improve the safety management skills of Captains/Drivers, Maintenance Technicians (Mechanics), Deckhands, Leadership Team, and shore-based Guest Services (GS) personnel including preparing for emergencies related both to safety and environmental protection

2.3 Implementation

In order to achieve the above objectives RTDS has adopted a safety and environmental protection policy that seeks to ensure:

- Compliance with all relevant mandatory rules and regulations
- Recognition of applicable codes, guidelines, and standards recommended by the Federal Motor Carrier Safety Administration (FMCSA), Washington State Utilities and Transportation Commission (UTC), United States Coast Guard (USCG), and the Occupational Safety and Health Administration (OSHA)

2.4 Functional Elements

RTDS has included the following functional elements in the development, implementation, and maintenance of the safety and environmental protection policy:

- Overall procedures with detailed instructions to ensure safe operation of the equipment and Ducks owned/operated by RTDS and protection of the environment in compliance with relevant international and Washington State legislation
- Oil pollution prevention education, equipment, and procedures
- Defined levels of authority and lines of communication between and amongst shore and shipboard personnel
- Procedures for reporting accidents and non-conformities within the provisions
- Procedures to prepare for and respond to emergency situations
- Procedures for internal audits and company management reviews

2.5 Company Commitment

RTDS has developed and implemented a written safety management system that applies to all levels of the Organization, including:

- All shore-based locations
- All Ducks, vehicles, and vessels
- All personnel who are directly involved or employed by RTDS

In order to meet our objectives in safety and environmental protection, RTDS requires total commitment from all personnel who are directly involved in RTDS operations. This includes shore-based managers and staff, Duck Captains, Duck Drivers, Maintenance Technicians, and other crew where applicable.

Chapter 5 – Employee Policy and Procedure Manual (Sections 5.5.6, 5.7.2 and 5.7.3 provided)

5.5.6 Passenger or Public Complaints

Passenger or public complaints regarding Duck operations will be investigated and tracked. Verified complaints or patterns of unverified complaints will result in additional training and may be subject to disciplinary actions.

5.7.2 Disciplinary Action

It is the expectation of RTDS that all employees will conduct themselves according to generally accepted standards of conduct and performance. Additionally, it is the expectation of RTDS that all employees perform in compliance with all USDOT/WUTC and USCG regulations, including but not limited to vehicle inspection requirements, Driver and Captain Qualification responsibilities, and hours of service limitations.

When employees do not meet these standards, it is the supervisor's responsibility to act in a timely manner and initiate a program of disciplinary steps to address the problem. Examples of situations which may require the supervisor to take immediate action include, but are not limited to: unsafe practice of procedures, fighting in the workplace, theft, refusal to perform work, excessive absenteeism, chronic tardiness, insubordination, incidents in company vehicles and poor attitude. This policy presents the basic principles and procedures of a system of progressive discipline which is intended to ensure that all employees are treated as consistently and fairly as possible.

For each step of disciplinary action, you will meet with your immediate supervisor and/or another management team member to discuss the infraction. The manager will inform you of the specific problem as well as the expected behavior and the two of you will discuss how the behavior can improve. If necessary, you will create a plan to avoid the disciplinary action from progressing. Failure to correct the behavior will result in further disciplinary action. All disciplinary actions will be documented by your immediate supervisor and included in your permanent employee file.

In most cases, disciplinary action will begin with a verbal warning for the first offense and will culminate with the discharge of the employee only after repeated attempts to correct the employee's behavior have failed. Serious infractions may warrant imposition of an immediate written reprimand, suspension or discharge, as appropriate. All corrective action steps will be documented and recorded in the employee's permanent file.

Corrective action steps resulting from formal discipline are:

- Verbal warning: First notification and warning to the employee
- Written reprimand: Formal notification in writing to the employee
- Suspension: Loss of work and wages for a specified number of hours or days
- Discharge: Termination of employment

RTDS reserves the right to take any level of disciplinary action as the management team feels is appropriate to the situation. Unacceptable performance or behavioral trends will require the management team take corrective action with the employee. If not corrected, these performance or

behavioral trends may lead to suspension or termination. Here are a few examples of behaviors you'll want to avoid:

- **Preventable Incidents:** If an employee has an accident of any type in a company vehicle, they will immediately receive a written warning. Any additional accidents within the next one (1) year will result in further disciplinary action up to and including termination.
- **Attendance:** Punctual attendance is mandatory at RTDS. If you are more than twenty minutes late or if you do not show up at work without speaking with someone in advance, you will immediately receive a written warning. Any additional tardiness or "no-shows" within the next one (1) year will result in further disciplinary action up to and including termination.
- **Unprofessional conduct:** Foul language or inappropriate behavior in front of customers will not be tolerated at any time and is grounds for an immediate written warning or possible termination.
- **Insubordination:** Insubordination will not be tolerated at any time and is grounds for an immediate written warning or possible termination.

5.7.3 Employment Termination

Should a pattern of unacceptable performance or behavior be established and not corrected, termination will be utilized. Possible reasons for immediate termination include, but are not limited to: dishonesty, unsafe job performance, illegal activities (on and off property), drug usage (on or off property), misappropriation of money or products, falsifying records, threatening a supervisor or fellow employee, harassment or disrespectful behavior.

In addition, RTDS reserves the right of "immediate termination" as a final solution when a particular action or behavior is deemed totally unacceptable and warrants immediate response.

Chapter 8 – Company Verification and Review

8.1 Policy and Implementation

It is RTDS policy to ensure that policies and procedures outlined in this Volume of the RTDS Code of Compliance are being enacted properly and in accordance with all safety regulations set forth by the FMCSA, DOT, USCG, OSHA and RTDS.

- RTDS will assign and schedule periodic evaluation of the Code of Compliances' efficiency and review the system in accordance with established procedures of the company, when needed.
- RTDS will determine types and frequency of internal audits, when they are required, how they are reported, and possible corrective actions, if necessary.
- Personnel selected to perform audits shall include those independent of the area being audited.
- RTDS will provide procedures for communication and reporting of internal audit findings for critical management review and to ensure management personnel of the area audited take timely and corrective action of deficiencies found.

8.2 General

The practice of performing internal audits provides RTDS with the assurance that RTDS Safety Regulations are being maintained and enforced throughout the company.

8.3 Responsibility

The Designated Person is responsible to ensure that scheduled internal audits are performed and any non-conformities are documented and remedied.

8.4 Audit Procedures

Audit Schedules

- HR and Administration
 - Captain Qualifications – Every 6 Months
 - Driver Qualifications – Every 6 Months
 - Other Safety Sensitive Employee Qualifications – Every 6 Months
 - Drug Testing – Every 3 Months
- Maintenance
 - Reporting and Documentation – Every 6 Months
 - Inspection Procedures – Annually
 - Scheduled and Periodic Maintenance – Annually
 - Duck equipment Audits – Annually
 - Maintenance Facility Operations and Safety – Every 6 Months
- Operations
 - Driver Procedural Audits – Each Driver Annually
 - Captain Procedural Audits – Each Captain Annually
 - Deckhand Procedural Audits – Each Deckhand Annually
 - Training Processes and Documentation – Annually
 - FMCSA driver fitness-related inspection results (<http://ai.fmcsa.dot.gov/SMS>) – Quarterly

- Guest Services
 - Site Operations and Safety – Every 6 Months
 - Safety Ground Guide Procedural Audits – Every 6 Months
 - Reporting and Documentation – Annually

Before the Audit:

- Schedule audits for enough in advance in order to give proper notification to all personnel necessary for the audit, in particular the auditee.

During the audit, auditors should:

- Equip themselves with relevant documentation.
- Interview personnel regarding operational procedures.
- Observe how operations are carried out.
- Fill out a non-conformity report if necessary.

After completing the audit, auditors must:

- Report to the relevant head of the department or department supervisor.
- Prepare a documented report containing all major audit findings (see Internal Audit Report).
- Ensure that the audit reports are distributed to relevant personnel within RTDS.

RTDS Internal Audit: Plan

RTDS Internal Audit: Plan	Date:
Department/Duck:	Audit No.:
Auditor:	Auditee:
Opening meeting: Begins at: Closes at: Present: Details:	
Conduct of audit (where more than one element is to be audited, several start and finish times may be given, i.e., one for each element) Details:	
Closing meeting Begins at: Closes at: Present: Details:	

RTDS Internal Audit: Report

RTDS Internal Audit Report	Date:	
Department/Duck	Audit No.:	
Auditor:		
Auditor/Auditee:		
Code of Compliance Reference:		
Non-conformity Statement:		
Signatures:	Auditor:	Auditee:
Proposed Corrective Action		
Immediate Action(s):		
Date for Completion:		
Further Action(s):		
Date for Completion:		
Signatures	Auditor	Auditee
Verification of Corrective Action Follow Up Details:		
Corrective Action(s) Closed Out:		
Signatures	Auditor	
Signatures	Designated Person	

Guidelines for the Internal Compliance Audit Report

All audit report forms should be completed in a consistent manner regardless of the auditor. All auditors should be given adequate instruction in completing this form.

Date:

The date on which the audit took place.

Department/Duck

Name of the department or Duck.

Audit Number

All audits should be given a unique number allocated by the designated person. The number should include the year of audit then an increasing count from 00. Example: 2015-01 or 2015-02

Code of Compliance Element Audited

This should identify the specific element(s) in the documented RTDS Code of Compliance being audited.

Auditor

The name of the auditor.

Auditee

Name of the head of department or Captain being audited.

Code of Compliance Reference

The reference to the part of the documented Code of Compliance being audited. This may be the identity number and title of a specific manual, such as the Emergency Procedures, or the Duck Operational Procedures, or specific procedures within it.

Non-Conformity Statement

If a non-conformity is found, a statement as to the non-conformity and a non-conformity report shall be made and attached to the RTDS Internal Audit Report.

Proposed Corrective Action

Corrective actions should be raised and agreement reached on action(s) and scheduled for completion. This requires agreement between the auditor and the auditee.

Where necessary to ensure safe operations and environmental protection in the short term, immediate action(s) should be taken. A date should be agreed for the completion of the immediate action(s).

In addition and where necessary, further corrective actions should be agreed. This may involve change of procedure, additional crew training, provision of new equipment, etc. A date for completion of further corrective action should be agreed.

Verification of Corrective Action

Follow up details should be recorded. These should identify precisely the way in which the corrective action is to be verified and should refer to the evidence required for verification.

A final signature is required from the designated person.

RTDS Safety Expectations

Quarterly Leadership Meeting Agenda

The following is an example agenda for the quarterly Leadership Meeting reference in the Safety Management Plan Overview, Performance Evaluations Pertaining to Compliance.

AGENDA

RTDS Quarterly Leadership Meeting

First Tuesday of February, May,
August, and November

9:00AM – 12:00PM

Meeting called by

Brian Tracey, CEO

Attendees:

General Manager, Director of Operations, Director of Safety, Fleet Maintenance Manager, Shop Foreman, Finance Manager, Director of Tour Development, Director of Sales, Director of Marketing, Customer Service Manager

Location:

RTDS Fleet Maintenance Facility Conference Room

9:00 – 9:20

Introduction

1. Current Company Big Picture Overview | Brian Tracey, CEO
2. Previous Meeting Minutes and Updates | Margaret Singbeil, Finance Mgr.

9:20 – 9:50

Operations and Compliance Review

1. State of Compliance and Audits | Ryan Johnson, Director of Operations.
2. Report and Review of Inspection Data | Ryan Johnson, Director of Operations.
<https://ai.fmcsa.dot.gov/SMS/Carrier/1905507/Overview.aspx>
3. Overview of Safety Sensitive Operations and Staffing | Moti Krauthamer, Director of Safety

9:50 – 10:20

Maintenance

1. Fleet Maintenance Department Overview and Emphasis | Joe Hatten, Fleet Maintenance Manager
2. Parts and Budget Updates | Joe Hatten, Fleet Maintenance Manager
3. Staffing Overview | Isaac Hoffman, Shop Foreman

10:20 – 10:40

Customer Service

1. Ridership Trends and Customer Comments | Tiffany Taylor, Customer Service Manager
2. Staffing Overview | Tiffany Taylor, Customer Service Manager

10:40 – 11:00

Marketing and Social Media

1. Current Marketing Emphasis | Ihlae Kling, Director of Marketing
2. IT and Social Media Overview | Ihlae Kling, Director of Marketing

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RTDS Training Programs and Updates

Ride the Ducks of Seattle has completed a thorough and complete review of all Driver and Maintenance Technician training programs. Additionally, Ride the Ducks has developed and/or updated training to educate staff in areas of which violations were discovered. These areas include, Driver training, Driver qualification file maintenance, drug and alcohol testing and training processes, and records retention standards.

Safety and Compliance Team:

Following the compliance investigation, Ride the Ducks of Seattle’s Safety and Compliance Team has worked with contracted FMCSA/DOT Regulation experts and contacts within the WUTC to develop a solid foundation of practical knowledge and understanding of the safety requirements set forth by the FMCSA for commercial motor vehicle carriers. Key members of the compliance team have been cross-trained in all areas of the regulations so that processes and compliance responsibilities are well known and will remain a focus on operations moving forward.

The compliance team has also worked with Aurico, a contracted Third Party Administrator, to become proficient in managing the internet-based information platform provided to them. The compliance and management training included instruction of how to access active participant rosters, random selection lists, test status, on-demand MIS reports, and other drug and alcohol program functions. Additionally, all RTDS compliance team members updated their DOT Supervisor and Reasonable Suspicion training and will do so for refresher every two year.

Driver and Captain Training Programs:

Ride the Ducks of Seattle has reviewed and redeveloped the entry level training program, ongoing and continued education programs, and return to duty training program for its Drivers and Captains. The following updates and/or changes have been made and are being implemented effective immediately:

Entry Level Training Program:

1. Updates to the Student Training Manual to include daily task and condition standard check sheets and training outlines.
2. Updates to the Instructors Training Manual to include daily task and condition standard check sheets and training lesson plans/guides.
3. Training assigned and scheduled to meet the requirements and certification of 49 CFR Parts 380.503 and 380.505.
4. Training altered for Drivers/Captains to exclude the study of tour information, narration, and entertainment. Drivers will only perform duties required to safely operate the vehicle and to respond to emergency situations.

Continuing Education Programs:

1. Updates to the tracking systems have been put in place to ensure proper documentation of driver compliance with RTDS continuing education requirements.
2. Courses planned for 2016 to include refreshers of Drug and Alcohol Compliance, Driver Qualifications, Hour of Service, Whistleblower Protection, Driver Wellness, Duck Mechanical Re-Familiarization, and Emergency Procedures.

Return to Duty Program:

1. All Drivers will be required to participate in the 2016 Return to Duty Training prior to being put back into passenger carrying service.
2. Ride the Ducks of Seattle updated the Return to Duty policy and procedures.

RTDS Driver/Captain Return to Duty Training 2016

Policy: It is a RTDS policy that Captains fulfill Return to Duty Training if they are not on the schedule for 30 or more consecutive calendar days.

Background and Implementation: Due to the seasonal nature of our business it is not uncommon for RTDS Captains to have significant changes in scheduled hours throughout the year. Experienced Duck Captains who have had initial qualification training may return to passenger carrying operations after extended leave by fulfilling all pre-employment administrative requirements, and the requirements set out in this Return to Duty Training process. Return to Duty training will ensure Captains stay informed and up to date on company policy, safety procedures, emergency preparedness, and will provide another opportunity for RTDS to check compliance with all necessary licenses and certificates.

Classroom Review: Updates and/or changes to the RTDS Code of Compliance will be reviewed.

Intro:

- Question and Answers
- Purpose and outline of refresher training
- Required paperwork for the employee and for compliant operations

Operations (Directors of Operations and Safety): Updates to RTDS Code of Compliance and Procedures

- Drivers will receive an overview of the current RTDS Code of Compliance Manual and updates since 9/24/2015.
- Entry-Level Driver Refresher Module (for all current RTDS CDL holders): Driver Qualification Requirements, Hours, hours of Service of Drivers, Driver Wellness, and Whistleblower Protection.
- Hours of Service review and practice filling out forms: see attached RTDS Procedure Update.
- Daily safety inspections: see attached RTDS Procedure Update.
- Tour Route Restrictions.
- Tour Route – Turn by Turn Guide.
- Duck equipment
 - o Guide Station
 - o GPS/Cameras
 - o PFD Numbers
 - o Seating Capacity

Responsibilities (Director of Safety):

- Deckhand (Tour Host) Responsibilities
 - o Safety
 - o Tour
- Driver (Captain) Responsibilities
 - o Safety
 - o Tour

Practice (Director of Safety and Director of Tour Development):

- Intros/Outros
- Prop storage and location
- The tour meld and chemistry.

Daily Vehicle Inspections: Each Captain will complete an entire Pre and Post Operation Inspection with a supervising trainer. The trainer will highlight any deficiencies or alterations required of the Driver to amend prior to beginning passenger carrying operations.

Drive Training: Each Driver will drive the entire tour route with a supervising trainer on board. The trainer will complete the Driver Operations Compliance Checklist. Trainers may request additional runs as necessary to ensure safe practice of the returning employee. The Driver may request additional practice runs if they feel a need for more practice. This request will be granted as long as there are no safety concerns.

Water Training: Each Driver will drive the entire water route with a supervising trainer on board. The trainer will complete the Driver/Captain Operations Compliance Checklist. Following the completion of one full tour evolution, the Driver/Captain will be required to perform the Emergency Drills as defined in the Ride the Ducks of Seattle Code of Compliance Manual.

Review and Questions: Drivers will have the opportunity to review and ask questions on any subject on which they feel they could use a refresher.

Return to Duty Certification: The supervising trainer will certify that the Driver has successfully fulfilled the Return to Duty Training and provide any feedback to increase safety. Ongoing operational recommendations and proof of training and certification records will be maintained by the Director of Safety.

Take Home: Each Driver will be given a copy of the RTDS Drug and Alcohol Policy, Drug and Alcohol Information, and Access to the current RTDS Code of Compliance Manual. Verification of receipt and understanding must be received prior to RTDS Drivers being allowed to drive.

Maintenance Technician Training Programs:

Ride the Ducks of Seattle has reviewed and redeveloped the entry level training program, ongoing and continued education programs, and return to duty training program for its Maintenance Technicians. The following updates and/or changes have been made:

Entry Level Training Program:

1. Implementation of an eight day structured entry level training process (Boot Camp). Students will receive training in areas of:
 - a. Company Culture and Safety Expectations, Maintenance Technician Duties and Responsibilities, and Maintenance Facility Standard Operating Procedures.
 - b. Drug and Alcohol testing procedures and compliance with RTDS Drug and Alcohol Testing Policies.
 - c. Vehicle familiarization, Daily Safety Inspection Procedures, and Personal Protective Equipment.
 - d. Hazardous materials and spill response.
 - e. Internal and emergency communication procedures.
 - f. Fleet Maintenance Software, work-orders, and parts ordering.
 - g. Lockout Procedures and Road Call Procedures.
 - h. Safety Ground Guide Training.
 - i. Forklift and other equipment safety overviews and certifications.
 - j. Maintenance reference materials, manuals, and step-by-step guides.
 - k. Incidents, chain of events, and situational awareness.
 - l. Review and Demonstrations.
2. Development and implementation of a Student Training Manual with daily and periodic task and condition standard check sheets to be maintained throughout the entire 90 day training and review period by the maintenance technician.
3. Addition of maintenance step by step procedures and training guides that remain accessible by all Maintenance Technicians at all times.

Continuing Education Programs:

1. Development and implementation of a weekly education and training program to further the abilities of RTDS Maintenance Technicians and Supervisors.
2. Calendar of weekly education programs. Topics to include:
 - a. Fleet Maintenance Software
 - b. Safety Ground Guide
 - c. Inspections (Daily, Periodic, and Special)
 - d. Lock Out Procedures
 - e. Specific maintenance and repair procedures
 - f. Maintenance Technician Qualifications and Requirements
3. Continuing Education requirements for Maintenance Technicians implemented by Ride the Ducks of Seattle as of January 1, 2016.

Return to Duty Program:

1. All Maintenance Technicians have been required to participate in the 2016 Return to Duty Training prior RTDS offering passenger carrying services.
2. 2016 Return to Duty training includes
 - a. Requirements of qualifications of Maintenance Technicians.
 - b. Annual Vehicle and Brake Inspector Qualifications and Documentation.
 - c. Annual Inspection procedures and documentation requirements.
 - d. Daily Vehicle Inspection Report procedure updates.

Maintenance Technician Training

Philosophy and Objectives of Maintenance Technician Training

Safety is the number one goal of all training and operations at Ride the Ducks of Seattle. All training material, classroom training, drive training, emergency drills, and continuing education sessions will first and foremost be focused on safe operations. Furthermore, the training itself will be conducted in a safe manner for the students, instructors, and the public.

The goal of all training will be to instill a top of mind awareness of safety, vehicle diagnostics, component repair, replacement, and inspections. Over the years RTDS has been able to identify very specific trends, practices, and risks that can be trained in a very detailed fashion resulting in safe and efficient maintenance practices.

Some companies have “Best Practices” for safety. Since “best” implies there is no further room for improvement RTDS implements a “Safe Practice” method of operation. This allows and more importantly tasks each and every employee to identify, report, and resolve any unsafe situation whether actual or hypothetical.

The three core values of RTDS are Safety, Responsibility, and Honesty. Teaching how to think about and act on these values is the foundation for all Maintenance Technician training.

The material in this training manual contains documents to assist in learning an incredible amount of information. This section will lay out the information and a timeline of mandatory training criteria, and additional courses/tests that can be used to strengthen the maintenance foundation of the individual employee.

As trainers and coworkers, we are here to assist you and develop you into safe and meticulous Duck Maintenance Technicians. There is a lot of information for you to learn and it is crucial that you understand and can practice all of it. Keep focused, stay on task, and ask questions as needed. We are here for you and we will make our time available to you in reaching your goals.

New Hire Maintenance Technician Training Overview

Each new Maintenance Technician (MT), regardless of previous experience, will be required to participate in a 90 day training and review period. During this important period of time, the new MT will receive training on specific Duck component inspection, repair, and component replacement. Each MT will be required to show the ability to perform each routine task with precision, accuracy, and safety always in mind. Within the 90 day training and review period the MT must complete training in the following areas:

- **RTDS Maintenance Facility and Equipment Usage**
 - Each MT will be trained on how and when to use the various tools that are available for RTDS Maintenance.
 - Each MT will be trained on how and when to use other Maintenance Facility tools, systems, and safety equipment such as:
 - RTDS parts washer.
 - RTDS transmission and radiator flush machines.
 - RTDS eyewash station and safety board.
- **Maintenance Software (TATEMS 20/20)**
 - Each MT will be trained on how and when to utilize the various tools within the RTDS Fleet Maintenance Software (TATEMS). Specifically, MTs will learn how and when to:
 - Create, populate, and submit maintenance job work orders.
 - Search and utilize the parts inventory.
- **Vehicle Lock-Out Training**
 - Each MT will be trained to the compliance practice and procedures of the RTDS Vehicle Lock-Out Program.
- **Component Knowledge and rebuild**
 - Each MT will be trained on how to perform the following component rebuilds:
 - Stretch Duck Transmission Adapter Plate.
 - Propeller Shaft Gear Box (Prop Box).
 - Stretch Duck Transfer Case.
 - Stretch Duck Differential.
 - Duck Wheel Hub Assembly.
- **Duck Specific Maintenance, R&R, and Inspection**
 - Each MT, no matter their level of previous experience, will be trained on Duck specific maintenance topics. These topics may include but are not limited to:
 - Differential repair, replacement, defect diagnostics.
 - Electrical systems repair, replacement and defect diagnostics.
 - Fuel delivery and vapor detection systems.
 - Front wheel assembly and water tight seals.
 - Audio and Video equipment.
 - Propeller engagement and drive train repair, replacement, and diagnostics.
- **Daily Vehicle Inspections and Reporting**
 - Each MT will be trained on the correct safety procedures to perform daily vehicle inspections and the process for completing the Daily Vehicle Inspection Reports.

- **Safety Ground Guide and Road Call Procedures**
 - Each MT will be trained on the correct procedures and standards for guiding vehicles in and out of the maintenance facility.
 - Each MT will receive training on road-call safety procedures and protocols.
- **Environmental, Hazardous Material, MSDS and Spill Clean-Up Procedures**
 - Each MT will be trained on the correct procedures and standards for recognizing, containing, and clean-up of fluid spills and leaks.
 - Each MT will be trained on the correct procedures and standards for fluid, aerosol, and hazardous material storage and identification. Including location, access, and familiarity with the RTDS Material Safety Data Sheet Logbook.
- **Forklift Safety**
 - Each MT must complete a RTDS Forklift Safety Training program. This program is designed using the standards of WA State L&I and OSHA Safety Regulations. Previous comparable Forklift Training Certifications will be accepted, but the MT must show proper procedures for operation and inspection prior to receiving RTDS forklift operational certification.
- **Complete the training for and possess a Washington State Boater Education Card.**
 - This course can be taken online at the BoatUS website from any computer on the maintenance floor or on your personal computer. Establish your personal log in and your sessions can be saved and worked on over time. RTDS pays for the completed course and has the card sent to the MT's home address. Once additional operations safety training has been completed, the MT will be allowed to operate Ducks on the water during maintenance operations.
- **Commercial Driver Training**
 - Each MT is required to compete the RTDS Driver/Captain Training as it applies to obtaining a Commercial Driver's License, learning standard Duck operating procedures, and maintenance department operations. If that MT is hired on outside of RTDS training season the requirement for CDL qualification will be extended until the next available training season.

All records of employee training shall be maintained and stored on file at the Maintenance facility in individual employee files by the Fleet Maintenance Manager. If circumstances arise that do not allow for the completed training of all parts listed above, there will be accommodations given to ensure proper completion of training. There will also be processes in place so that work is not assigned to un-trained employees. Completion of all training does not dictate continued future employment nor does incompleteness ensure termination.

Each MT is required to understand the concepts and procedures presented in this manual and Volumes 1 & 3 of RTDS Code of Compliance Manual, throughout their employment with RTDS. It is the MTs' responsibility to make sure he/she understands the content and the policies of RTDS and will abide by all the rules and regulations put forth in the RTDS Code of Compliance.

Each MT is required to understand the concepts and procedures presented in this manual throughout their employment with RTDS. It is the MT's responsibility to make sure he/she understands the content and the policies of RTDS, and to the best of their ability, abide by all the rules and regulations put forth in

this Code of Practice. Between revisions of this manual, safety bulletins, procedure updates, and other operations notices may be posted on RTDS Basecamp. It is the responsibility of each MT to monitor Basecamp and read and understand all of these updates.

Ride the Ducks of Seattle encourages the full participation of all employees in the development and practice of safety procedures. If at any time during employment, you have questions or concerns regarding any of the concepts or procedures in this manual, please contact your immediate supervisor or the Director of Operations.

RTDS Maintenance Technician Training Specifics

Boot Camp – 2 Weeks

Fleet Maintenance Technician Boot Camp encompasses the first two weeks of the new Maintenance Technician's Training and review period. Boot Camp has been designed to introduce the standards of safety and RTDS fleet maintenance to the new employee and build a solid foundation of which the employee can continue to grow throughout their career.

At RTDS, we understand that not everyone learns the same way or has the same abilities. Therefore, we provide a balanced approach of book learning, demonstration, and hands on practice to train all of our employees.

Upon successful completion of Boot Camp the Maintenance Technician will have the ability to perform Daily Vehicle Safety Inspections, be familiar with RTDS fleet maintenance practices, equipment, and facilities, and have the ability to locate resources to assist and guide them through the many processes that make up Ride the Ducks of Seattle Maintenance Program.

Observation and Immersion – 10 Weeks

The remaining 10 weeks of the training and review period will be used to broaden the Maintenance Technician's RTDS Fleet Maintenance skill-set, and sharpen their decision making and diagnostic abilities. During the observation and immersion period the Maintenance Technician will complete multiple training modules to fulfill remaining requirements of the RTDS Maintenance Technician Training Program.

At the completion of the 12 week period the Maintenance Technician will receive an employee review provided by their supervisor. Completion of all training does not dictate continued future employment nor does incompleteness ensure termination.