Penalty Assessment: TV-230988

RenoRelo Worldwide, LLC. d/b/a ProRelo Group, LLC.- Corrective Action Plan

Below is the corrective action we have taken to ensure we comply with Washington state laws.

CONTROLLED SUBSTANCES AND ALCOHOL BASIC PROCESS

All employees will receive training in controlled substances and alcohol, using the video and exam offered by JJ Keller & Associates "Alcohol & Drug Testing; What Drivers Need to Know". This process has already been started and will be completed no later than the 1st quarter of 2024 for all WA employees.

In the event of a failed controlled substance test, the DER will inform the General Manager of that location and the HR Manager. The General Manager and HR Manager will be responsible for informing the employee of a failed test and its implications.

We use Concentra as our consortium and our DER monitors details of testing through the Concentra online portal. We recently found that we had a cap on our account that did not allow us to add an unlimited number of drivers. This was corrected by our DER, so all drivers are in the collective pool for random screening.

DRIVER FITNESS BASIC PROCESS

The Agent Safety Representative (ASR) has developed a checklist that will be kept in each driver's qualification file, to easily see when the required documents have been put into the file.



The ASR will do physical audits of driver qualification files in March and October each year, to ensure all required documents are on file. Reminders for renewals will be put into the Movers Suite system by the ASR. Tasks will be set for reminders to notify the ASR at least 2 weeks before a renewal is due.

General	Labor Type	Branch	Interface Mapping	User	Dispatch	Safety	Accounting	Advance	Web User	Mobile		
					Place License Cl		inistrative Hol	d on this re	cord			
Last Physical Date 01/06/2023					Next Physical Date 01/06/2025 Next MVR Date 08/22/2024							
Last Background Check Date 08/22/2023 Background Check CID				Next Background Check Date 08/22/2026								
	446408670											

The ASR will contact the driver and their General Manager to request the needed renewal and will follow up to ensure it is obtained or the driver is put out of service, until it is obtained.

We have amended our DMV Release Agreement to include the verbiage that "drivers must submit copies of all vehicle and roadside inspections and moving violations to the ASR within 24 hours. In the event a driver's CDL is revoked or suspended, drivers are required to inform the ASR of this immediately following notification". See "**Exhibit A**" for a copy of the updated document.

When new drivers are hired, they are required to take mandatory entry level classes on the Unigroup Learning Hub. A list of the classes required for a new driver are included on "**Exhibit B**".

Driver documents will be retained, per DOT Rule 49 CFR Part 40 Section 40.333.

§ 40.333 What records must employers keep?

(a) As an employer, you must keep the following records for the following periods of time:

(1) You must keep the following records for five years:

(i) Records of alcohol test results indicating an alcohol concentration of 0.02 or greater;

(ii) Records of verified positive drug test results;

(iii) Documentation of refusals to take required alcohol and/or drug tests (including substituted or adulterated drug test results);

(iv) SAP reports; and

(v) All follow-up tests and schedules for follow-up tests.

(2) You must keep records for three years of information obtained from previous employers under <u>\$40.25</u> concerning drug and alcohol test results of employees.

(3) You must keep records of the inspection, maintenance, and calibration of EBTs, for two years.

(4) You must keep records of negative and cancelled drug test results and alcohol test results with a concentration of less than 0.02 for one year.

(b) You do not have to keep records related to a program requirement that does not apply to you (e.g., a maritime employer who does not have a DOT-mandated random alcohol testing program need not maintain random alcohol testing records).

(c) You must maintain the records in a location with controlled access.

(d) A service agent may maintain these records for you. However, you must ensure that you can produce these records at your principal place of business in the time required by the DOT agency. For example, as a motor carrier, when an FMCSA inspector requests your records, you must ensure that you can provide them within two business days.

(e) If you store records electronically, where permitted by this part, you must ensure that the records are easily accessible, legible, and formatted and stored in an organized manner. If electronic records do not meet these criteria, you must convert them to printed documentation in a rapid and readily auditable manner, at the request of DOT agency personnel.

Drivers are expected to always have their valid CDL and medical examiner card on their person, while on duty.

Our written progressive disciplinary policy is part of our Employee Handbook, which has been acknowledged by each employee either digitally in our payroll system or via a manual signed acknowledgment form. See "**Exhibit C**" for policy details.

OneRelo has implemented a Controlled Substance and Alcohol Policy that meets the guidelines presented in the audit. See "**Exhibit D**" for the updated policy and employee acknowledgement.

For random selections, our Consortium (Concentra) notifies our ASR of the driver(s) selected. Our ASR notifies the General Manager or the Dispatcher of the needed random screening, either by phone or email. The ASR works with the General Manager/Dispatcher to determine the nearest place/time the driver can do the random screening. Once details are finalized on the date/time, the ASR schedules the screening and advises the drivers directly that he or she has 2 hours to report to the testing lab, and failure to report and supply a sample is considered a positive result. Testing site details are communicated to the General Manager/Dispatcher as well, so that all are in the loop on the date/time testing is required. Results are communicated back to the ASR and kept on file. The GM/Dispatcher is notified only of a positive test result.

All drivers are tested as required by 49CFR Parts 40 & 382 of the FMCSR and the process is facilitated by our ASR, with the assistance of their respective General Manager/Dispatcher.

Applicants for safety sensitive positions will be queried in the clearinghouse by the ASR. Previous employers will be contacted using the form in **"Exhibit E**". This form will be kept on file, as part of the driver's file.

When a new driver is hired, the ASR will confirm that the medical examiner is listed on the National Registry of Certified Medical Examiners. A copy of the verification will be put into the driver qualification file.

We have changed our driver's application, to follow WA state regulations. All driver applicants will now use the Tenstreet platform to apply.

We are now aware that all full-time employees that we intend to hire in the state of WA must have background check on file (not just employees in safety sensitive positions). Background checks are now on file for all Washington employees and will be kept for the required 3-year period. Any new hires will be asked to complete background checks, in compliance with WA state standards.

All drivers will be fully and properly qualified before operating on our authority. We will maintain a complete file, as required for each driver, documenting the qualification process.

All vehicle maintenance and inspection records will be maintained in the Movers Suite system. General Managers are responsible for uploading records into the system and notify our ASR of the new documents, so that follow-up tasks can be assigned, if needed.

We have adopted a new vehicle preventative maintenance inspection form, to use at all locations. Each General Manager is responsible for performing the periodic inspections and uploading their records/findings in the Movers Suite system. Our ASR has visibility to these forms and will provide oversight, to ensure they are abiding by agreed time or mileage intervals. See "**Exhibit F**" for a copy of the preventative maintenance form.

Exhibit A-DMV RELEASE AGREEMENT

ONERELO WORLDWIDE (AKA: RENORELO WORLDWIDE LLC) will obtain your MVR from the Department of Motor Vehicles for review. This report will be used in consideration of your continued employment with ONERELO WORLDWIDE. Thereafter, our Broker of record will review your DMV report on an annual basis. Our Insurance Carrier has a set standard that you must maintain at all times. If your record goes below that standard your employment may be terminated immediately.

**Drivers must submit copies of all vehicle and roadside inspections and moving violations to the ASR within 24 hours. In the event a driver's CDL is revoked or suspended, drivers are required to inform the ASR of this immediately following notification.

Please check if you wish to receive a copy of the report. If so, it will be provided to you at no charge at the same time it is provided to ONERELO WORLDWIDE.

 \Box Yes, I would like to have a copy of my DMV report.

Your signature below acknowledges that you have read and understand the above notice.

Print Name:	
License No.:	_State:
Date of Birth:	
Signature:	_ Date:

Exhibit B-New Driver Training Courses

					First				
Course code	Course Name	User status	Enrolled	Expiration date	First access date	Course Completion	Credits (CEUs)	Total time	Score
_scorm12_u_qalcp_o1	O1 Quality Labor Overview		12/11/2023 1:18:57 pm		12/11/2023 2:44:35 pm	12/11/2023 2:48:14 pm	0.00	0h 4m	0.00
_scorm12_u_qalcp_o2	O2 Understanding Your Role	Completed	12/11/2023 1:18:57 pm		•	12/11/2023 3:04:38 pm	0.00	0h 16m	100.00
_scorm12_u_qalcp_o3	O3 Appearance, Attitude and Teamwork	Completed	12/11/2023 1:18:57 pm			12/11/2023 3:30:48 pm	0.00	0h 26m	83.33
_scorm12_u_qalcp_o4	O4 Dependability and Respect	Completed	12/11/2023 1:18:57 pm		12/11/2023 3:31:15 pm	12/11/2023 3:35:41 pm	0.00	0h 5m	90.00
_scorm12_u_qalcp_inventory_cpi	I1 Carrier- Packed Inventory	Completed	12/11/2023 1:19:42 pm		12/12/2023	12/12/2023 10:04:13 am		0h 8m	80.00
_scorm12_u_qalcp_inventory_voi	I2 Van Operator Inventory	Completed	12/11/2023 1:18:57 pm			12/12/2023 10:34:08 am		0h 30m	96.00
_scorm12_u_qalcp_m1	M1 Preparation for Moving	Completed	•			12/11/2023 4:19:39 pm	0.00	0h 26m	92.31
_scorm12_u_qalcp_m2	M2 Lifting and Moving Equipment	Completed	12/11/2023 1:18:57 pm			12/12/2023 8:10:26 am	0.00	0h 28m	80.00
_scorm12_u_qalcp_m3	M3 Basic Wrapping	Completed	12/11/2023 1:18:57 pm		12/12/2023	12/12/2023 8:35:21 am	0.00	0h 25m	80.00
_scorm12_u_qalcp_m4	M4 Wrapping Special Items	Completed	12/11/2023 1:18:58 pm			12/12/2023 8:41:45 am	0.00	0h 6m	100.00
_scorm12_u_qalcp_m5	M5 Disassembly and Wrapping Part One	Completed	12/11/2023 1:18:58 pm			12/12/2023 8:54:35 am	0.00	0h 13m	80.00
_scorm12_u_qalcp_m6	M6 Disassembly and Wrapping Part Two	Completed	12/11/2023 1:18:58 pm			12/12/2023 9:07:17 am	0.00	0h 12m	90.00
_scorm12_u_qalcp_m7	M7 Appliances and Electronics	Completed	12/11/2023 1:18:58 pm			12/12/2023 9:20:22 am	0.00	0h 13m	90.00
_scorm12_u_qalcp_m8	M8 Loading and Tier Building	Completed	12/11/2023 1:18:58 pm			12/12/2023 9:34:09 am	0.00	0h 12m	80.00
_scorm12_u_qalcp_m9	-	Completed	12/11/2023 1:18:58 pm			12/12/2023 9:46:37 am	0.00	0h 11m	100.00
_scorm12_u_qalcp_p1	P1 Non- Allowables	Completed	12/11/2023 1:19:42 pm		12/11/2023 3:36:10 pm	12/11/2023 3:53:12 pm	0.00	0h 17m	80.00
_scorm12_u_qalcp_p2	P2 Preparation for Packing	Completed			12/12/2023	12/12/2023 10:37:36 am		0h 3m	88.89
_scorm12_u_qalcp_p3	P3 Packing Materials and Carton Construction	Completed	12/11/2023 1:19:42 pm		12/12/2023	12/12/2023 10:42:09 am		0h 4m	90.00
_scorm12_u_qalcp_p4	P4 Use of General Cartons and Labeling	Completed	12/11/2023 1:19:42 pm			12/12/2023 10:48:02 am		0h 6m	80.00
_scorm12_u_qalcp_p5	P5 Packing Non-Breakables Kitchen		12/11/2023 1:19:42 pm			12/12/2023 10:50:58 am		0h 3m	90.00
_scorm12_u_qalcp_p6	P6 Packing Non-Breakables Continued		12/11/2023 1:19:43		12/12/2023 10:52:04	12/12/2023 10:56:44 am		0h 5m	80.00
_scorm12_u_qalcp_p7	P7 Packing Fragile Items	Completed	pm 12/11/2023 1:19:43 pm			12/12/2023 11:01:26 am		0h 4m	100.00
_scorm12_u_qalcp_p8	P8 Packing Home Decorating Accessories	Completed	12/11/2023 1:19:43 pm		12/12/2023	12/12/2023 11:05:50 am		0h 4m	100.00
_scorm12_u_qalcp_p9	P9 Preparing and Packing Electronics	Completed	12/11/2023 1:19:43 pm			12/12/2023 11:11:44 am		0h 6m	92.31

Course code	Course Name	User status	Enrolled	Expiration date	First access date	Course Completion	Credits (CEUs)		Score
u_flex_videos	FLEX Training Videos	Completed	12/7/2023 10:36:42 am		12/11/2023	12/11/2023 12:53:13 pm		0h 4m	0
u_sfty_samsara_driver_app_eld	Samsara Driver App (Driver ELD Training)	Completed			12/11/2023	12/11/2023 12:59:30 pm		0h 6m	86.70
u_sfty_samsara_alerts	Samsara Alerts	Completed			12/11/2023	12/11/2023 1:01:35 pm	0.00	0h 1m	100.00
u_sfty_samsara_maintenance	Samsara Maintenance	Completed			12/11/2023	12/11/2023 1:02:27 pm		0h 1m	100.00
u_sfty_samsara_managing_us_eld_and_hos	Samsara Managing US ELD and HOS	Completed			12/11/2023	12/11/2023 12:15:37 pm		0h 9m	86.00
u_sfty_samsara_navigating_driver_app	Samsara Navigating the Driver App	Completed			12/11/2023	12/11/2023 12:21:25 pm		0h 5m	100.00
u_sfty_samsara_reporting	Samsara Reporting	Completed			12/11/2023	12/11/2023 12:23:21 pm		0h 1m	100.00
u_sfty_samsara_cameras_and_safety	Samsara Cameras and Safety	Completed			12/11/2023	12/11/2023 10:45:51 am	0.00	0h 6m	80.00
u_sfty_samsara_us_dvir	Samsara US Driver Vehicle Inspection Reports (DVIRs)	Completed			12/11/2023	12/11/2023 12:25:27 pm		0h 2m	100.00
u_stride_2.0_app_training	STRIDE 2.0	Completed	12/7/2023 10:36:43 am			12/11/2023 12:31:12 pm		0h 6m	0
u_sfty_driver_agent_safety_forum_recorded_web_2023	2023 Driver and Agent Safety Forum (Recorded Webinars)	Completed	12/7/2023 10:36:43 am		12/11/2023	12/11/2023 12:35:14 pm		0h 6m	0
u_sfty_personal_conveyance_2023	Personal Conveyance 2023	Completed	12/12/2023 1:40:15 pm			12/12/2023 2:21:45 pm	0.00	0h 16m	0
_scorm12_u_jjkeller_sas_entry-level_fat_2023_65323	Safe and Smart Entry-Level Driver Training: Fatigue and Wellness Awareness		12/7/2023 10:36:43 am			12/11/2023 12:41:52 pm		0h 9m	100.00
_scorm12_u_jjkeller_sas_entry-level_med_2023_65329	Safe and Smart Entry-Level Driver Training: Medical Requirements		12/7/2023 10:36:43 am			12/11/2023 12:49:02 pm		0h 5m	80.00
u_dod_lithium_batteries_packers	Defense Training on Lithium Batteries - Packers	Completed	12/12/2023 1:41:30 pm			12/12/2023 2:01:31 pm	0.00	0h 16m	0
u_dod_lithium_battiers_crew_leaders	Department of Defense Training on Lithium Batteries - Crew Leaders	Completed	12/12/2023 1:41:30 pm		12/12/2023 2:02:04 pm	12/12/2023 2:04:58 pm	0.00	0h 3m	0
u_sfty_samsara_recorded_webinar_apr2023	Samsara Dashboard Training (Recorded Webinar)	Completed	12/7/2023 10:36:43 am			12/11/2023 12:49:35 pm		23s	0
u_inspections_pre-trip_enroute_dvir_2023	Inspections - Pre-Trip, En Route, DVIR, Vehicle Maintenance Log and DOT Audit 2023	Completed	12/12/2023 1:40:16 pm			12/12/2023 2:47:44 pm	0.00	0h 25m	0

Course code	Course Name	User status	Enrolled	Expiration date	First access date	Course Completion	Credits (CEUs)	Total time	Score
u_jjkeller_hos_basics_2023_61340	Hours of Service Training Module 1: Basics 2023	Completed	12/7/2023 10:37:10 am		12/11/2023 10:46:39 am	12/11/2023 10:49:05 am		0h 2m	80.00
u_jjkeller_hos_limits_2023_61342	Hours of Service Training Module 2: Limits 2023	Completed	12/7/2023 10:37:10 am			12/11/2023 11:00:11 am		0h 10m	100.00
u_jjkeller_hos_exceptions_2023_61346	Hours of Service Training Module 4: Exceptions 2023	Completed	12/7/2023 10:37:10 am			12/11/2023 11:27:52 am		0h 27m	100.00
_scorm12_u_jjkeller_csa_2023_41305	CSA Know the BASICs 2023	Completed	12/7/2023 10:37:10 am			12/11/2023 11:42:51 am		0h 15m	100.00
_scorm12_u_jjkeller_vehicle_inspection_2023_48447	Vehicle Inspections Tractor Trailers 2023	Completed	12/7/2023 10:37:10 am			12/11/2023 11:45:38 am		0h 3m	100.00
_scorm12_u_jjkeller_cmv_roadside_2023_48443	Roadside Inspections for CMV Drivers 2023	Completed	12/7/2023 10:37:10 am			12/11/2023 11:54:44 am		0h 9m	85.00
u_jjkeller_distracted_driving_prevent_2023_63573	Distracted Driving Prevention 2023	Completed	12/7/2023 10:37:10 am			12/11/2023 12:01:28 pm		0h 6m	96.70
u_sfty_van_operator_accident_reporting_proced_2023	Van Operator Accident Reporting Procedures 2023	Completed	12/7/2023 10:37:10 am			12/11/2023 12:05:11 pm		0h 4m	0

Total: 50

Classrooms

 $\label{eq:course} \textbf{Course and session information Start date Attendance Status Score}$

No results found.

Exhibit C-Progressive Disciplinary Policy

OneRelo expects employees to comply with **OneRelo** standards of behavior and performance and to correct any noncompliance with these standards.

Under normal circumstances, OneRelo endorses a policy of progressive discipline in which it attempts to provide employees with notice of deficiencies and an opportunity to improve. It does, however, retain the right to administer discipline in any manner it sees fit. This policy does not modify the status of employees as employees at will or in any way restrict OneRelo's right to bypass the disciplinary procedures suggested.

The following steps are suggested in the discipline procedure. All steps should be documented in the employee disciplinary file.

Step 1: Informal Verbal Discussion. When a performance problem is first identified, the nature of the problem and the action necessary to correct it should be thoroughly discussed with the employee and documented as a note to file. A copy must be sent to HR to be kept in the employee disciplinary file.

Step 2: Counseling: 1st Written Warning. If a private informal discussion with the employee has not resulted in corrective action, following a thorough investigation, the supervisor should meet with the employee and (a) review the problem, (b) permit the employee to present information regarding the problem, (c) advise the employee that the problem must be corrected, (d) inform the employee that failure to correct the problem will result in further disciplinary action that may include discharge, and (e) issue a counseling notice to the employee and send the a copy to HR to keep in the employee disciplinary file.

Step 3: Reprimand: 2nd Written Warning. If satisfactory performance and corrective action are not achieved under Steps 1 and 2, the supervisor and a representative from the HR department should meet with the employee in private and proceed via (a) through (d) above and issue a 2nd written notice to the employee. A copy must be sent to HR to be kept in the employee disciplinary file.

Step 4: Reprimand: 3rd Written Warning or Suspension. Supervisors have the authority to temporarily remove employees from the workplace, with or without pay, if approved in advance by the department director and the director of HR. An exempt employee generally may not be suspended without pay for less than a full day, and the suspension must be related to written workplace conduct rules applicable to all employees, such as a written policy prohibiting sexual harassment or workplace violence. Written documentation must be given to HR to be kept in the employee disciplinary file.

Step 5: Failure to improve. Failure to improve performance or behavior after the written warning or suspension can result in termination. Written documentation must be given to HR to be kept in the employee disciplinary file.

The progressive disciplinary procedures described above also may be applied to an employee who is experiencing a series of unrelated problems involving job performance or behavior.

In cases involving serious misconduct, or any time the supervisor determines it is necessary, such as a major breach of policy or violation of law, the procedures contained above may be bypassed. Typically, the supervisor should suspend the employee immediately (with or without pay), and an investigation of the

incidents leading up to the suspension should be conducted to determine if any further action, such as termination, should be taken.

We expect each employee to act in a mature and responsible manner at all times. To avoid any possible confusion, we note several examples of unacceptable activities below. Engaging in an unacceptable activity or violating any OneRelo rule or policy in this handbook or elsewhere may result in disciplinary action including up to termination. This list is not all-inclusive and nothing in this handbook will change the at-will status of your employment.

If you have any questions concerning any work rule, safety rule, or any of the unacceptable activities listed, please see your supervisor, or contact HR for an explanation.

- Theft
- Fraud
- □ Falsifying or altering OneRelo documents and records, including, but not limited to, qualification documents, driver logs, expense claims, timesheets, customer records, research, or other documentation.
- □ Fighting or assaulting another person, to include verbal aggression.
- Being on OneRelo or customer premises under the influence of alcohol or illegal drugs
- Damaging property
- □ Unauthorized or excessive absences
- □ Insubordination
- □ Improper use or disclosure of Confidential Information
- □ Violating OneRelo's policy on unlawful harassment or discrimination
- □ Violating OneRelo's policies on equal opportunities
- □ Any breach of conduct or duty that brings OneRelo into disrepute, or actions that are inconsistent with the relationship of trust and fidelity required between OneRelo and its employees.



I. Purpose

OneRelo Worldwide has established this alcohol and controlled substances testing program for those employees who are drivers of OneRelo Worldwide's Commercial Motor Vehicles (CMVs) and who require a Commercial Driver's License (CDL), in compliance with the requirements of the Federal Motor Carrier Safety Administration (FMCSA) and the U.S. Department of Transportation (DOT).

Specifically, it is the policy of OneRelo that the use, sale, purchase, transfer, possession, or presence in one's system of any controlled substance (as defined in this Policy) by any driver while on OneRelo's premises, engaged in company business, while operating company equipment, or while under the authority of OneRelo is strictly prohibited.

Government regulations require OneRelo to conduct drug and alcohol testing of personnel employed in certain positions. Testing requirements vary according to the agency having jurisdiction and the statutes that apply. It is the policy of OneRelo to comply with all applicable regulations regarding such testing. OneRelo will follow all applicable federal and state drug testing requirements, including, but not limited to, federal DOT and FMCSA regulations. To the extent the regulations are updated or revised from time-to-time, this Policy shall be considered amended to conform with all applicable requirements.

Participation in OneRelo's controlled substances and alcohol testing program is a requirement of each covered driver and, therefore, is a condition of employment.

II. Scope

This Policy applies to all employees who are required to hold a CDL and operate a CMV.

The FMCSA Regulations set the minimum requirements for testing covered employees. OneRelo's Policy may, in certain instances, be more stringent. This Policy clearly identifies which aspects are mandated by the FMCSA Regulations, and what is EMPLOYER policy and procedure.

III. Definitions

For purposes of this Policy, the following definitions shall apply:



- A. "Alcohol concentration" (or content) means the alcohol in a volume of breath expressed in terms of grams of alcohol per 210 liters of breath as indicated by an evidential breath test.
- B. "Commercial motor vehicle" ("CMV") means a motor vehicle or combination of motor vehicles used in commerce to transport passengers or property if the vehicle:
 - 1. Has a gross combination of weight rating at 11,794 or more kilograms (26,001 or more pounds) inclusive of a towed unit with a gross vehicle weight rating of more than 4,536 kilograms (10,000 pounds);
 - 2. Has a gross vehicle weight rating of 11,794 or more kilograms (26,001 or more pounds);
 - 3. Is designed to transport 16 or more passengers, including the driver; or
 - 4. Is of any size and is used in the transportation of materials found to be hazardous for the purposes of the Hazardous Materials Transportation Act (49 U.S.C. 5103(b)) and which require the motor vehicle to be placarded under the Hazardous Materials Regulations (49 CFR part 172, subpart F).
- C. "Confirmatory drug test" means a second analytical procedure performed on a urine specimen to identify and quantify the presence of a specific drug or drug metabolite.
- D. "Confirmed Drug Test" means a confirmation test result received by a MRO from a laboratory.
- E. "Driver" means any person who operates a commercial motor vehicle. This includes, but is not limited to: full time, regularly employed drivers; casual, intermittent, or occasional drivers; leased drivers and independent, owner- operator contractors who are either directly employed by or under lease to an employer or who operate a commercial motor vehicle at the direction of or with the consent of an employer. For purposes of pre-employment testing only, "driver" shall include a person applying to drive a Commercial Motor Vehicle.
- F. "Performing (a safety-sensitive function)" means a driver is considered to be performing a safety sensitive function during any period in which he/she is actually performing, ready to perform, or immediately available to perform, any safety-sensitive functions.
- G. "Safety-sensitive function" means all time a driver begins to work or is required to be in readiness to work until the time he/she is relieved from work and all responsibility for performing work. Safety-sensitive functions shall include:



- 1. All time at an employer or shipper plant, terminal, facility, or other property, or on any public property, waiting to be dispatched, unless the driver has been relieved from duty by the employer;
- 2. All time inspecting equipment within the meaning of the FMCSA regulations or otherwise inspecting, servicing, or conditioning any CMV at any time;
- 3. All time spent at the driving controls of a CMV in operation;
- 4. All time, other than driving time, in or upon any CMV except time resting in a sleeping berth;
- 5. All time loading or unloading a vehicle, supervising, or assisting in the loading or unloading, attending a vehicle being loaded or unloaded, remaining in readiness to operate the vehicle, or in giving or receiving receipts for shipments loaded or unloaded; and
- 6. All time repairing, obtaining assistance, or remaining in attendance upon a disabled vehicle.

To the extent these definitions are modified by changes in the applicable DOT or FMCSA regulations, this Policy is deemed revised to be consistent with the applicable regulations.

IV. Policy

A driver who violates the FMCSA prohibitions of this Policy, including refusal to be tested, shall be immediately removed from all FMCSA safety-sensitive functions.

Under OneRelo's independent authority, the driver may also be subject to disciplinary action, up to and including termination of employment. OneRelo reserves the right to take action against a driver, where appropriate, for violation of other OneRelo policies that are separate from this Policy.

V. Designated Employer Representative

If you have questions regarding this Policy, please contact:

Charlene Arazosa at 775-404-7356 ext. 1016 or via email at <u>Charlene.Arazosa@onereloww.com</u> or Heather Price at 775-404-7356 ext. 1018 or via email at Heather.Price@onereloww.com.

VI. Prohibitions

- A. Substances Prohibited
 - 1. Alcohol:



"Alcohol" use means the drinking or swallowing of any beverage, liquid mixture, or preparation (including any medication), containing alcohol.

2. Controlled Substances:

In accordance with FMCSA rules, urinalysis will be conducted to detect the presence of the following substances:

- a. Marijuana
- b. Cocaine
- c. Opiates
- d. Amphetamines
- e. Phencyclidine (PCP)

Detection levels shall be in accordance with the guidelines adopted by the FMCSA in accordance with the recommendations established by the DOT, 49 CFR Part 40.

- B. Alcohol Prohibitions
 - 1. No driver shall report for duty or remain on duty requiring the performance of safety-sensitive functions while having an alcohol concentration of 0.04 or greater.
 - 2. A driver found to have an alcohol concentration of 0.02 or greater, but less than 0.04, shall not perform any safety-sensitive functions for at least 24 hours.
 - 3. No driver shall use alcohol while performing safety sensitive functions.
 - 4. No driver shall perform safety-sensitive functions within four (4) hours after using alcohol.
 - 5. No driver required to take a post-accident alcohol test shall use alcohol for eight (8) hours following the accident, or until he/she undergoes a post-accident alcohol test, whichever occurs first.
 - 6. No driver shall refuse to take a required test.
- C. Controlled Substances Prohibitions
 - 1. No driver shall report for duty (or remain on duty) requiring the performance of safety sensitive functions when the driver uses any controlled substance, except when the use is pursuant to the instructions of a licensed medical practitioner who has advised the



driver that the substance does not adversely affect the driver's ability to safely operate a CMV.

- 2. No driver shall report for duty, remain on duty, or perform a safety-sensitive function if the driver tests positive or has adulterated or substituted a test specimen for controlled substances.
- 3. No driver shall refuse to take a required test.

VII. Circumstances for Testing

The FMCSA requires that controlled substances and alcohol tests be given to drivers in the following circumstances:

A. <u>Pre-Employment</u>

Every applicant for a driving position will be required to submit to and pass a urine drug test as a condition of employment.

Each applicant will be asked whether he/she has tested positive on a DOT preemployment drug or alcohol test for any DOT employer during the previous two (2) years. Each applicant will also be asked whether he/she has refused to be tested during the previous two (2) years. An applicant who has previously tested positive, or refused to be tested, will not be considered for employment until or unless he/she successfully completes DOT's return to duty process.

Each applicant shall sign a release form authorizing OneRelo Worldwide to obtain information and documentation regarding his/her participation in the previous employer's controlled substances and alcohol program.

B. <u>Reasonable Suspicion</u>

OneRelo shall require a driver to submit to an alcohol and/or controlled substances test when a supervisor has reasonable suspicion to believe that the driver has engaged in prohibited conduct. The basis for this decision will be specific, contemporaneous, articulable observations concerning the employee's behavior, speech, and/or body odor(s). Such behavior must be witnessed and documented by a supervisor or Company official who is trained in compliance with FMCSA rules and regulations. The employee's supervisor or another Company official will immediately remove the employee from any and all safety- sensitive functions and take the employee or make arrangements for the employee to be taken to the testing facility.

Reasonable suspicion testing for alcohol may occur only if the supervisor's observations are made during, just preceding, or just after the driver is performing safety-sensitive functions or is attempting to perform safety-sensitive functions.



Reasonable suspicion testing for controlled substances may be based on a supervisor's observations anytime the employee is on duty.

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

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

C. <u>Post-Accident</u>

All employees are to notify their immediate supervisor as soon as possible if they are involved in an accident. The employee will be tested for drugs and alcohol as soon as practicable following the accident if the accident involved:

- 1. A fatality;
- 2. Bodily injury with immediate medical treatment away from the scene *and* the employee received a citation, or
- 3. Disabling damage to any motor vehicle requiring tow away *and* the employee received a citation.

OneRelo may also choose to conduct drug and/or alcohol testing on employees under its own authority on employee(s) involved in an accident/incident that may not meet the FMCSA's definition of "accident" noted above, but which resulted in property damage, personal injury, and/or loss of work time.

The employee must remain readily available for testing. If the employee is not readily available for alcohol and drug testing, he/she may be deemed as refusing to submit to testing. However, this requirement should in no way delay necessary medical attention for injured people or prohibit the employee from leaving the scene of the accident to obtain assistance in responding to the accident or to obtain necessary emergency medical care.

An employee involved in an accident may not consume alcohol for eight (8) hours following the accident or until testing is completed.

If the alcohol test is not administered within two (2) hours following the accident, the employee's immediate supervisor, with assistance from the Designated Employer Representative, if needed, will prepare a report and maintain a record stating why the test was not administered within two (2) hours.



If the alcohol test is not administered within eight (8) hours following the accident, all attempts to administer the test will cease. A report and record of why the test was not administered will be prepared and maintained.

The drug test must be administered within thirty-two (32) hours of the accident. If the test cannot be administered within thirty-two (32) hours, all attempts to test the employee will cease. The employee's immediate supervisor, with assistance from the Designated Employer Representative, if needed, will prepare and maintain a record stating the reasons why the test was not administered within the allotted time frame.

The results of a test for the use of controlled substances conducted by Federal, State, or local officials having independent authority for the test shall be considered to meet the requirements of this section, provided such tests conform to the applicable Federal, State, or local controlled substances testing requirements and the results of the tests are obtained by OneRelo.

D. <u>Random Testing</u>

OneRelo will conduct random testing for all covered drivers as follows.

- Onerelo will use a selection process based on a scientifically valid method prescribed by FMCSA regulations.
- According to FMCSA regulations, FMCSA driver random testing pools will be maintained separately from all other employees subject to random testing by EMPLOYER.

A percentage of OneRelo's average number of covered employees will be tested for alcohol each year. A percentage of OneRelo's average number of covered employees will be tested for controlled substances each year. The percentages are to be determined annually as prescribed by the DOT. As of the effective date of this Policy, the minimum annual percentages are 10% of the average number of driver positions for alcohol testing and 50% of the average number of driver position for drug testing.

The random testing will be spread reasonably throughout the calendar year. All random alcohol and drug tests will be unannounced, with each covered employee having an equal chance of being tested each time selections are made. Thus, a driver may be selected more than once during a year.

A covered employee may only be tested for alcohol while he/she is performing a safety-sensitive function, just before performing a safety-sensitive function, or just after completing a safety-sensitive function. A random test for controlled substances can be scheduled at any time the driver is on duty.



Once notified that he/she has been randomly selected for testing, the subject employee must proceed immediately to the assigned collection site. If the employee engages in conduct that does not lead to a collection as soon as possible after notification, such conduct may be considered as a refusal to submit to a test.

For random tests, the subject employee's immediate supervisor will be responsible for providing transportation to the collection site.

E. <u>Return-to-Duty</u>

OneRelo is not obligated to (and by the inclusion of this provision in this Policy does not undertake or commit to any obligation under the Policy to) reinstate, retain, and/or rehire any covered employee who violates any DOT, FMCSA, or Company prohibition or requirement concerning drugs or alcohol.

In accordance with the FMCSA regulations, before a driver can be returned to duty requiring the performance of a safety-sensitive function after engaging in prohibited conduct (Section IV), the driver must be evaluated by a substance abuse professional, participate in any treatment program prescribed, and pass a DOT return-to-duty controlled substances and/or alcohol test. The driver must have a verified negative controlled substances test or an alcohol test result of less than 0.02 to return to a safety-sensitive function.

F. Follow-Up

A driver who returns to duty after complying with the recommendation(s) of a Substance Abuse Professional ("SAP"), and after providing a negative result on a Return-to-Duty test, is subject to unannounced, directly observed alcohol and/or controlled substances testing as directed by the Substance Abuse Professional. Follow-up testing may be scheduled for a period of up to sixty (60) months and must include no fewer than six (6) tests to be conducted in the first twelve (12) months after the employee's return-to-duty date. Follow-up alcohol testing shall be conducted only just prior to, during, or just after the driver's performance of safety-sensitive functions, or when the driver is in readiness to perform safety- sensitive functions.

VIII. Refusal to Submit to Testing

An employee may not refuse to submit to a post-accident, random, reasonable suspicion, return-to-duty, or follow-up alcohol or controlled substances test required by law and/or this Policy. An employee who refuses to submit to such tests may not perform or continue to perform safety-sensitive functions and may be subject to termination.

For purposes of this Policy, and as defined by the FMCSA, "refusal to submit" (to an alcohol or controlled substances test) means:



- 1. Failing to appear for any test drug or alcohol test (except a pre- employment test) within a reasonable time, as determined by EMPLOYER, after being directed to do so.
- 2. Failing to remain at the testing site until the testing process is complete;
- 3. Failing to provide a urine sample for any drug test required by DOT or FMCSA regulations;
- 4. Failing to permit direct observation or monitoring during the collection of a urine sample in situations in which direct observation or monitoring is required;
- 5. Failing to provide a sufficient amount of urine when directed without an adequate medical explanation for the failure;
- 6. Failure or refusal to take a second test after being directed to do so by Onerelo or the collector;
- 7. Failing to undergo a medical examination or evaluation, as directed by the MRO as part of the verification process, or as directed by OneRelo, following an inability to provide a sufficient urine or breath sample;
- 8. Failing to cooperate with any part of the testing process (e.g. refusing to empty pockets when directed to do so by the collector, behaving in a confrontational way that disrupts the collection process); or
- 9. Having a verified adulterated or substituted test result.
- IX. Alcohol Testing Procedures

Alcohol testing will be conducted at a collection facility pre-approved by OneRelo by a qualified Breath Alcohol Technician in accordance with 49 CFR Part 40 procedures. Only products on the conforming products list (approved by the National Highway Traffic Safety Administration) and Part 40 requirements will be utilized for testing under this Policy.

If the result of the screening test is an alcohol concentration of 0.02 or greater, a confirmation test must be performed. The confirmation test must be conducted at least 15 minutes, but not more than 30 minutes, after the completion of the initial test.

If the results are 0.04 or greater, the driver will be removed from his/her driving duties and attendant safety-sensitive functions and evaluated by a SAP.



Refusal to complete and sign the testing form, or refusal to provide breath or an adequate amount of breath, will be considered a positive test, and the driver will be removed from safety-sensitive functions until resolved.

X. Drug Testing Procedures

Specimen collection will be conducted in accordance with applicable state and federal law. Drug testing will be at a collection facility pre-approved by OneRelo. The collection procedures will be designed to ensure the security and integrity of the specimen provided by each driver, and those procedures will strictly follow the federal chain-of-custody guidelines.

A. Laboratory Analysis

As required by FMCSA regulations, only a laboratory certified by the Department of Health and Human Services to perform urinalysis for the presence of controlled substances will be retained by OneRelo. The laboratory will be required to maintain strict compliance with federally approved chain-of-custody procedures, quality control, maintenance, and scientific analytical methodologies.

All specimens are required to undergo an initial screen followed by confirmation of all positive screen results.

B. Results

According to FMCSA regulations, the laboratory must report all test results directly to the MRO. All test results must be transmitted to the MRO in a timely manner, preferably the same day that the review by the certifying scientist is completed. All results must be reported.

The MRO is responsible for reviewing and interpreting all confirmed positive, adulterated, substituted, or invalid drug test results. Any driver testing positive for the presence of a controlled substance will be contacted by the MRO. The driver will be allowed to explain and present medical documentation to explain any permissible use of a drug. All such discussions between the driver and the MRO will be confidential. If the driver declines to discuss the result, the MRO will verify the test as positive or as a refusal to test because of adulteration or substitution, as applicable. If medically supportable reasons exist to explain the positive result, the MRO will report the test result to OneRelo as negative.

If the test result is verified as positive, or as a refusal to test because of adulteration or substitution, the MRO shall inform the employee of his/her right to request a retest of the split specimen at a different DHHS-approved laboratory, and of the process for doing so. Such request must be made by the employee within 72 hours of the employee having been informed of a verified positive test result.



If the driver has not contacted the MRO within 72 hours of being notified of a verified positive controlled substances test, and the MRO concludes there is no legitimate explanation for the driver's failure to contact the MRO within 72 hours, then a split specimen does not have to be tested.

If, after making three reasonable efforts within 24 hours, the MRO is unable to reach the driver directly, the MRO shall contact the DER, who shall direct the driver to contact the MRO within 72 hours. If, after making three reasonable efforts within 24 hours, the DER is unable to contact the driver, the MRO will report the positive result.

XI. Confidentiality

Except as authorized or required by law, or expressly authorized or required by the FMCSA regulations, OneRelo shall not release employee information that is contained in records maintained per 49 C.F.R. Section 382.405.

The employee is entitled, upon written request, to obtain copies of any records pertaining to his/her use of alcohol or controlled substances, including any records pertaining to his or her alcohol or controlled substances test.

All records will be maintained and retained as specified in the FMCSA's rules and regulations.

XII. Action Which May Be Taken for Policy Violations

OneRelo will not stand-down a covered employee before the MRO has completed the verification process, unless OneRelo has applied for and received an FMCSA- issued waiver.

No person who has failed an alcohol or drug test, or who has refused to be tested, will be allowed to perform in a safety-sensitive position, until such person has complied with the referral, evaluation, and treatment requirements by a SAP.

In addition to the consequences set forth in this Policy, which are mandated by the FMCSA, OneRelo imposes the following additional consequences pursuant to OneRelo's independent authority, in accordance with [Drug-free and alcohol-free workplace policy in OneRelo Employee Handbook]:

1. Following a controlled substances test result of positive, substituted, or adulterated, and the employee does not request a split sample test, or the split sample test confirms the initial result, the employee will be subject to discipline, up to and including termination. If the split sample testing disputed the initial test



results, or if the initial test results are designated invalid, the employee will be reinstated.

- 2. An employee's refusal to test for alcohol or controlled substances will be considered a positive test result. Pursuant to OneRelo's independent authority, an employee whose conduct is considered a refusal to test will be subject to discipline, up to and including termination.
- 3. Upon notification that an employee has failed an alcohol test (0.04% BAC or greater), the employee will be subject to discipline up to and including termination.
- 4. Upon notification that an employee tested 0.02% BAC or grater, but less than 0.04 BAC in initial and confirmatory tests for alcohol, the employee will be subject to discipline.

XIII. Education and Training

Any employee who has questions or concerns regarding this Policy may seek clarification and further details from the DER.

Educational materials will be provided to each driver, including a copy of this Policy and information concerning: the effects of alcohol and controlled substances use on an individual's health, work, and personal life; signs and symptoms of an alcohol or controlled substances problem; and available methods for intervening when an alcohol or controlled substances problem is suspected.

Supervisors who are designated to determine whether or not reasonable suspicion exists (and who then order a FMCSA driver to undergo testing under FMCSA rules and regulations) will receive at least 60 minutes of training on recognizing alcohol misuse and at least 60 minutes of training on recognizing controlled substances use. The training shall cover the physical, behavioral, speech, and performance indicators of probable alcohol misuse and use of controlled substances.



AUTHORIZATION FOR RELEASE OF MEDICAL INFORMATION FOR THE COMPANY DRUG AND ALCOHOL TESTING POLICY FOR SAFETY SENSITIVE EMPLOYEES

I, ______, hereby authorize Concentra Medical Center to release to OneRelo Worldwide and its designated agents, its medical review officer, and it's substance abuse professionals, the results of any drug and/or alcohol tests required by the Company. I expressly understand and agree that the Company will review the results of these tests in connection with making a decision concerning my employment. Other than for the purpose of making a determination concerning my employment, I understand that the Company will not use or further disclose the information released pursuant to this authorization unless further expressly authorized by me or unless disclosure is required by law.

This authorization shall become effective immediately and remain in effect for one (1) year. I understand that I have the right to receive a copy of this authorization upon request.

Employee's Signature

____/___/____ Date

Employee's Printed Name



ACKNOWLEDGMENT OF RECEIPT FOR THE COMPANY DRUG AND ALCOHOL TESTING POLICY SAFETY SENSITIVE EMPLOYEES

I certify that I am in receipt of, have read, and do understand the Company's policy regarding drug and alcohol testing.

I understand these documents are not intended to create a contract, and do not create a contract. I acknowledge that the policy described herein may be changed at any time, with or without notice to me.

Employee's Signature

____/___/____ Date

Employee's Printed Name

Place original in personnel file.

Exhibit E-Employment Verification Request

OneRelo

OneRelo Worldwide

1135 S. Rock Blvd. Ste. 330 - Reno, NV. 89502

Employment Verification Request

Company Name:					
Attention:				1	
Return to:	Charlene A	razosa			
	+1 775-404				
Email:	Charlene_A	razosa@one	reloww.con	1	
Driver Name:					
SN (last four):					
mployment Dates:	From:	_	To:		<u>-</u>
	From:		To:		-
	From:		To:		_
osition:					
quipment: (Circle)	Tractor Tr	railer S	Straight Truc	k	
T vs ST (if applicable	2	%		_%_	
railer: (Circle)	Dry Van	Flat Bed	Tanker	Reefer	Other
eparation Reason: (Ci	rcle) Curren	t Quit	Laid C	ff	Discharged
ehire Eligibility: (Circ	le) Yes	No	Upon 1	Review	Reason for Discharge
	(Attitude, Atte	andance, Log	Violation, et	c.)	

Was this driver involved in any accidents: (Circle)_____ Yes No

If you circle "Yes", then please provide details below.

Date:	Prev (Y/N)		# Fatalities	Tows (Y/N)	City / State	Damage Amount	Description
			-				

	(0	ircle)
Has the driver ever refused a required drug or alcohol test?	Yes	No
Has the driver ever tested positive on a required controlled-substance test?	Yes	No
Has the driver ever tested at or above 0.04 on any required alcohol test?	Yes	No
Has the driver ever violated any other provisions of the DOT drug and alcohol testing regulations?	Yes	No
Have you received information from any previous employer that this individual violated DOT drug and alcohol regulations?	Yes	No

Preparer's Printed Name:

Preparer's Title:

Date:

Preparer's Signature:

CONFIDENTIAL.

Last Update 12/27/2023

	VI	HILLE P	KEVENII	/E MA	INTENAN	CE LOG FO	UK YEAK			-				
Vehicle Identifacation No. (VIN):	License No:	Agency Vehicle #	Year:	Make	e & Model	Category Type	Category Type	Beginning Mileage	Date Placed in Service		# of Seats	# ADA Stations	Disposal Date	
Scheduled PM Service Task	Establish ed Service Interval	Actual Miles/Cyc les at Service	Date Service Completed	By: (initial s)	Next Svc Due (Miles, Cycle or Date)	Actual Milesł Cycles at Service	Date Service Comleted	By: (initials)	Next Svc Due (Miles, Cycle or Date)	Actual Miles /Cycles at	Date Service Complete d	By: (initials)	Next Svo Due (Miles, Cycle or	
Oil Change / Filter / Lube														
Standard PM Inspection									_					
Tire Rotation														
Diagnostic & Tune-Up							-							
Service Brakes				C				10						
Replace Belts				0										
Tire Replacement														
Battery Replacement														
Annual Certified Safety Inspection														
ADA Wheelchair Lift Service (list)														
List Other Manufacturer Recommended Service:														

Standard Diagnistic & Tune-Up includes: (List tasks):