

Version: 24.0	Driving Safety - US	
	Effective Date	May 20, 2024
	Page	1 of 8

Brunel Energy, Inc.

Driving Safety - US

Contents

1. Purpose	2
2. Applicability	2
3. Responsibilities	2
4. Requirements	3
4.1. Operating Requirements	3
4.2. Passengers	4
4.3. Driver Qualifications	4
4.4. Review of Motor Vehicle Record	4
4.5. Maintenance	4
4.6. The Company Supplied Vehicles	5
4.7. Employee Use of Other than Company Owned Vehicles (For Business Use)	5
4.8. Personal Use	5
4.9. Traffic Violations	6
4.10. Driver Responsibilities	6
4.11. Vehicle Safety	7
5. Training	8
6. Recordkeeping	8
7. Reference	8

Version: 24.0	Driving Safety - US	
	Effective Date	May 20, 2024
	Page	2 of 8

1. Purpose

- 1.1. Brunel Energy, Inc., herein, the “Company,” has established and will maintain a systematic process to select, approve and train qualified drivers who drive Company-owned, leased or rented vehicles in order to protect employees, the Company’s assets, and the driving public.

2. Applicability

- 2.1. This policy applies to employees, subcontractors and/or visitor(s) of the Company. For the purposes of this policy, an employee shall be considered on the job whenever he/she is:
 - 2.1.1. On or in, any Company or client property, including parking areas; or
 - 2.1.2. On Company time even if off Company premises (including paid lunch, rest periods and periods of being on call).
- 2.2. As a condition of employment, Company employees are required to abide by additional governmental or customer policies and requirements that may be imposed at a worksite in addition to the requirements of these policies and procedures. Nothing set forth in this policy constitutes, construes, or interprets in any way as a contract of employment.

3. Responsibilities

- 3.1. Manager(s) and HSE Supervisor(s) shall ensure:
 - 3.1.1. An effective system is in place at the facility to ensure that Company vehicles are maintained in accordance with Company policies, vehicle manufacturer’s recommendations and regulatory requirements.
 - 3.1.2. Drivers are selected and authorized to drive in accordance with qualification criteria set forth in this policy and applicable regulations.
 - 3.1.3. Drivers receive driver training as needed.
 - 3.1.4. All vehicular collisions involving Company vehicles are promptly investigated in a thorough manner and the cause(s) of the collision identified. The results of collision investigations will be utilized to help decrease the chances of recurrence.
- 3.2. Employee(s) shall:
 - 3.2.1. Be familiar with this procedure and the local workplace vehicle safety program. Follow all requirements, report unsafe conditions, and follow all posted requirements.
 - 3.2.2. Understand that random drug testing is part of the Company’s work safe program. If any employee refuses to take a drug test or tests positive for an illegal substance, termination is immediate. All drug tests will become part of the employee’s medical record and will be kept on record and confidential for 30 years at the Company corporate office. If at any time the Company changes ownership, then employee medical records will be turned over to the responsibility of new owners.

Version: 24.0	Driving Safety - US	
	Effective Date	May 20, 2024
	Page	3 of 8

4. Requirements

4.1. Operating Requirements

- 4.1.1. Company vehicles are provided to support business activities and are to be used only by qualified and authorized employees. In all cases, these vehicles are to be operated in strict compliance with motor vehicle laws of the jurisdiction in which they are driven and with the utmost regard for their care and cost-efficient use.
- 4.1.2. Company vehicles may not be driven internationally unless expressed written consent is provided by management.
- 4.1.3. Only authorized employees will drive a motor vehicle in the course and scope of work or operate a Company-owned vehicle.
- 4.1.4. Employees are responsible for possessing a valid driver's license for the type of motor vehicle they operate.
- 4.1.5. Employees are prohibited from operating a motor vehicle while under the influence of drugs or alcohol. This includes:
 - 4.1.5.1. blood alcohol level at or above the local legal limit;
 - 4.1.5.2. illegal drugs; and
 - 4.1.5.3. prescription medications that cause drowsiness or other conditions that may cause impairment. Employees taking prescription medication that may impact their safety shall report this to their supervisor.
- 4.1.6. Motor vehicle incidents occurring while on Company business must be reported. The program should include procedures to follow in the event of an incident, such as calling emergency services and reporting the incident to the insurance company and the employee's supervisor.
- 4.1.7. Any cargo on or in motor vehicles must be adequately stored and secured to prevent unintentional movement of the equipment which could cause spillage, damage to the vehicle, or injury to the operator.
- 4.1.8. The vehicle shall be used for its intended purpose.
- 4.1.9. Vehicles shall be maintained in safe working order. Pre-use inspections should be performed before operating a vehicle. This consists of a walk-around the vehicle to check for any defects to the vehicle and ensure there are no barriers blocking the path.
- 4.1.10. Company-owned vehicles shall have a maintenance program in place meeting the minimum manufacturer's recommendation. In the event employees are driving personal vehicles for Company business, pre-use inspections and regular vehicle maintenance must still be completed.
- 4.1.11. Seat belt use is mandatory for the driver and passengers while the vehicle is in operation.

Version: 24.0	Driving Safety - US	
	Effective Date	May 20, 2024
	Page	4 of 8

4.1.12. Authorized drivers must follow safe driving practices. Some examples of safe driving practices include hands-free cell phone use, cell phone use prohibited while driving, not manipulating radios or other equipment which may cause distraction, not exceeding the posted speed limit and maintaining a safe distance between other vehicles.

4.1.13. In the event of a theft of a Company vehicle, authorities and fleet manager must be notified immediately.

4.2. Passengers

4.2.1. No unauthorized passengers on or in the Company's work vehicles. If passengers are in the vehicle, there must be a valid explanation presented to the Company. Prior to travel, all passengers including the driver must wear a seatbelt anytime the vehicle moves from a parked position.

4.3. Driver Qualifications

4.3.1. Authorized employee of the Company only.

4.3.2. Must be at least 21 years of age.

4.3.3. Have at least one year of experience in the class of vehicle operated.

4.3.4. Must meet licensing requirements.

4.3.5. Will not qualify to drive a Company vehicle if, during the last 60 months, the driver had any of the following experiences:

4.3.5.1. Been convicted of a felony.

4.3.5.2. Been convicted of sale, possession, or use of drugs.

4.3.5.3. Been convicted of an alcohol- or drug-related offense while driving.

4.4. Review of Motor Vehicle Record

4.4.1. State Motor Vehicle Records (MVRs) will be used as the source for verifying driver history. MVRs will be obtained and reviewed at least annually on all authorized drivers.

4.4.2. Driving privileges may be withdrawn or suspended and/or the Company vehicle removed from any authorized driver not meeting the above requirements. In addition, appropriate disciplinary action may be taken, up to and including termination of employment.

4.5. Maintenance

4.5.1. Authorized drivers are required to properly maintain their Company vehicles at all times. Vehicles should not be operated with any defect that would inhibit safe operation during current and foreseeable weather and lighting conditions. Preventive maintenance such as, but not limited to regular oil changes, lubrication, tire pressure, tire replacement, brake pad & rotor replacement and fluid should be performed on the vehicle, as required in the owner's manual, by a certified mechanic.

Version: 24.0	Driving Safety - US	
	Effective Date	May 20, 2024
	Page	5 of 8

- 4.5.2. The Company provided vehicles will be maintained in accordance with current policy and standards. The driver will be responsible for checking the vehicle prior to each use. A thorough internal and external inspection for wear and any defects should be conducted at least weekly. Tires are particularly vulnerable to wear and damage and will be subject to close visual examination at least weekly.
- 4.5.3. Tires will be changed before wear or damage can cause failure.
- 4.5.4. Tires fitted to The Company vehicles should be new when fitted and should be high quality from a recognized manufacturer. The pressures should be maintained within manufacturer specifications at all times. Tire changes should be made between 50% and no later than 100% of the manufacturer’s recommended duration depending on wear and condition.
- 4.5.5. Any vehicles provided by Third Party should be inspected by the user prior to use and should conform to this standard.
- 4.6. The Company Supplied Vehicles
 - 4.6.1. Vehicles used for movement of personnel to and from worksites must have sufficient seat belts for each passenger. All passengers and drivers in the Company supplied vehicles wear seat belts while the vehicle is moving. Failure to do so will result in disciplinary action up to and including termination.
 - 4.6.2. Only the Company authorized personnel will drive and travel in Company vehicles.
 - 4.6.3. Personnel are prohibited from riding in the bed of trucks or on the outside of any other type of vehicles not designed for that purpose.
 - 4.6.4. Drivers shall inspect their vehicles prior to each journey.
 - 4.6.5. Vehicles shall be maintained in a road-worthy condition on a regular recorded schedule.
 - 4.6.6. Drivers shall adopt safe driving behaviors as defined in safe driving program which minimizes distractions, obeys traffic laws, and utilizes defensive driving techniques.
 - 4.6.7. All drivers will drive with their headlights on during the daytime except where prohibited by Law.
 - 4.6.8. If it is necessary for the driver to place or answer a cellular telephone call, the driver shall use a hands-free cell phone or, cautiously pull off the road, stop the vehicle in a safe place, and remain there for the duration of the call.
- 4.7. Employee Use of Other than Company Owned Vehicles (For Business Use)
 - 4.7.1. The Company does not assume any liability for bodily injuries or property damage that may occur while utilizing a vehicle other than a Company owned vehicle.
 - 4.7.2. No employee may drive a non-Company owned vehicle for Company business without the express written consent of management.
- 4.8. Personal Use

Version: 24.0	Driving Safety - US	
	Effective Date	May 20, 2024
	Page	6 of 8

4.8.1. Company vehicles are provided primarily for business purposes; however, occasional personal use may be permitted with written authorization from management. Personal use is a privilege extended only to the authorized employee. The privilege of personal use may be withdrawn at any time by the Company. Rules Applying to Use of Company Vehicles:

- 4.8.1.1. Only authorized employee, must meet all driver qualifications and rules of this policy
- 4.8.1.2. Use by an employee spouse or significant other must have express written consent of management.
- 4.8.1.3. Personal trailers, including boats and recreational vehicles, are not to be pulled.
- 4.8.1.4. Company vehicles are not to be driven while under the influence of alcohol or any controlled substance.
- 4.8.1.5. Possession, transportation or consumption of alcohol or illegal drugs by anyone in the vehicle is not allowed.
- 4.8.1.6. Driver and all passengers must wear available personal restraints.
- 4.8.1.7. Report any accident immediately to proper authorities and immediate manager.
- 4.8.1.8. Any exceptions to these rules require advance, written approval by approved Company manager or officer. Violation of these rules will result in disciplinary action from removal of driving privileges to termination of employment.

4.9. Traffic Violations

4.9.1. Fines for parking or moving violations, towing storage or impoundment are the personal responsibility of the assigned operator. Each driver is required to report all moving violations to their Supervisor immediately. This requirement also applies to violations involving the use of a personal vehicle while on Company business or a Company vehicle on personal business. Failure to report violations will result in appropriate disciplinary action, including revoking of driver privileges and possible termination of employment.

4.10. Driver Responsibilities

- 4.10.1. Each driver is responsible for the actual possession, care, and use of the Company vehicle in their possession.
- 4.10.2. Operation of the vehicle in a manner consistent with reasonable practices that avoid abuse, theft, neglect, or disrespect of the equipment.
- 4.10.3. Obey all traffic laws.
- 4.10.4. The use of seat belts and shoulder harnesses is mandatory for driver and passengers.

Version: 24.0	Driving Safety - US	
	Effective Date	May 20, 2024
	Page	7 of 8

- 4.10.5. Adhering to manufacturer's recommendations regarding service, maintenance and inspection. Vehicles should not be operated with any defect that would prevent safe operation.
- 4.10.6. Attention to and practice of safe driving techniques and adherence to current safety requirements.
- 4.10.7. Restricting the use of vehicles to authorized drivers.
- 4.10.8. Reporting the occurrence of moving violations.
- 4.10.9. Accurate, comprehensive, and timely reporting of all accidents by an authorized driver and thefts of a Company vehicle to the Company Supervisor. Failure to comply with any of these responsibilities will result in disciplinary action, up to and including termination of employment.

4.11. Vehicle Safety

- 4.11.1. Passenger compartments are to be free from loose objects that might endanger passengers in the event of an incident. Any vehicle with non-segregated storage shall be equipped with a cargo net or equivalent to separate the storage area.
- 4.11.2. Vehicles (light vehicles, heavy vehicles, and trailers) may not be modified without the endorsement of the manufacturer.
- 4.11.3. Signs, stickers, or labels are to be fitted in such a manner that they do not obstruct the driver's vision or impede the driver's use of any controls.
- 4.11.4. Employees driving vehicles are required to follow safe driving practices:
 - 4.11.4.1. Obey all federal and local driving laws or regulations as well as requirements of clients.
 - 4.11.4.2. Immediately report any citation, warning, traffic violation, collision, vehicle damage or near miss associated with Company or client vehicle operation or while driving on Company duties to the supervisor.
 - 4.11.4.3. Immediately report any restriction or change to driving privileges to the supervisor.
 - 4.11.4.4. Seat belts shall always be worn by all occupants any time the vehicle is in motion; only seats fitted with three-point inertia-reel type seatbelts shall be used. All vehicles capable of more than 10 mph/15 kph shall have seat belts installed.
 - 4.11.4.5. Drivers shall be well rested, alert, and sober on the road. Drivers should continually search the roadway to be alert to situations requiring quick action.
 - 4.11.4.6. Drivers should stop about every two hours for a break and get out to stretch, take a walk and get refreshed.
- 4.11.5. Where the Company provides vehicles for transport of personnel, such as crew changes, then these vehicles must be used.

Version: 24.0	Driving Safety - US	
	Effective Date	May 20, 2024
	Page	8 of 8

- 4.11.6. The driver must be qualified, competent, possess a valid driver’s license.
- 4.11.7. Seat belts must be fitted and must be worn by ALL occupants before the driver departs. The most senior person by title in the vehicle will be held accountable for the behavior of all other personnel.
- 4.11.8. Speed limits must be adhered to.
- 4.11.9. Personnel must take appropriate measures to avoid driving in darkness or in adverse weather conditions (e.g., heavy rain or snowstorm). Appropriate measures include planning, use of weather forecasts and contingency planning for identification and use of safe stopping areas.
- 4.11.10. There will be no consumption or carrying of any drugs, alcohol, certain medications, weapons, or firearms in the Company provided vehicle.
- 4.11.11. Authorized drivers will report any collision or traffic violation while driving on Company business to the appropriate personnel.
- 4.11.12. Loads shall be secure and shall not exceed the manufacturer’s specifications and legal limits for the vehicle.
- 4.11.13. The vehicle shall be used for its purpose and shall be the correct size and designed for the intended use.

5. Training

- 5.1. All new employees who drive vehicles for Company business (which includes those leased by the Company) must successfully complete the required training prior to operation of any vehicle for Company use.
- 5.2. Refresher Training - All drivers who drive for the Company or have the possibility of driving a Company vehicle.

6. Recordkeeping

- 6.1. The Company will maintain a Motor Vehicle Record (MVR) and Review of Motor Vehicle Record for a minimum of three years in the employee’s file.

7. Reference

- 7.1. The National Institute for Occupational Safety and Health (NIOSH) – Motor Vehicle Safety at Work