



Genesee Transportation, Inc.

Loss Prevention Program – Revised 4/1/2022

Employee Safety Policy

The Genesee Transportation, Inc. (GTI) Loss Prevention Program (LPP) is based on the premise that every employee is entitled to a safe and healthy work environment. Our LPP is designed specifically for the protection of our employees, clients and visitors. The management team and all employees are directed to make safety and loss prevention a top priority.

GTI believes that every employee should be aware of their own safety and the safety of their coworkers. The LPP will assist our employees in recognizing that these policies and procedures are for their protection. The goals we have set for our LPP are achieved through a cooperative effort among all employees and management. Safe work habits and the awareness of safety guidelines are a condition of your employment at GTI. All employees are required to attend training to become proficient with Company policies and procedures and to abide by them. These policies and procedures will be enforced and failure to comply can result in reprimand, suspension or employment termination.

All employees are encouraged to identify all dangerous workplace environments and make their supervisor aware of hazardous conditions. It is through company-wide participation that accidents can be prevented. It is recognized that for Company policies and procedures to be effective, all GTI employees, transporters, office staff, and maintenance personnel, must be familiar with the safety program elements. GTI will make every effort to assist our employees to be able to comply with all policies and procedures. In addition, a positive safety attitude will be developed and preserved by each employee.

Our policies and procedures toward safety are in no way limited to the guidelines that follow. All unsafe practices, whether or not they are included in this document, will be addressed immediately. It is our desire to reduce the number of occupational injuries at GTI.

As President of GTI, I am committed to all of our clients and employees' complete safety.

Shajan Baby
President
Genesee Transportation, Inc.

A. Company safety goals and objectives

Genesee Transportation, Inc. is committed to providing its employees and clients with a safe and healthful working environment. To achieve this environment the company has established the following goals, objectives and strategies:

Goals

1. Annually reduce employee accidents and injuries until they stand at or near zero.
2. Help develop safe work habits and attitudes among employees.
3. Provide a channel of communication between employees and management.

Objectives

1. Establish an LPP that will reduce the number of injuries and accidents to a minimum, not merely keeping with, but surpassing the best experience of other operations similar to GTI.
2. Eliminate all injury in the workplace at GTI by enhancing awareness and establishing clear training guidelines.

Strategies

1. Review workplace injuries quarterly for trends and causes of accidents.
2. Review our LPP annually to meet the current safety needs of the company.
3. Provide supervisors and employees with safety training in the following areas:

B. Work Standards and Guidelines

All Genesee Transportation, Inc. employees are expected to be familiar with and abide by all the following policies and procedures. Our policies and procedures toward safety are in no way limited to the guidelines that follow. All unsafe practices, whether or not they are included in this document, will be addressed immediately. Failure to comply with any policy will be cause for disciplinary action and can lead to reprimand or termination.

1. Always report any injuries or accidents to a direct supervisor. Know where first aid facilities are located. All injuries should be treated immediately.
2. Dangerous and distracting behavior, including practical jokes can lead to accidents and will not be tolerated.
3. Obey all warning tags and signs posted throughout the workplace or facilities that you will be working at or visiting.
4. Be careful when lifting or pushing heavy objects or clients. Avoid unnecessary back injuries by following safety guidelines:
 - Keep neutral curve in low back.
 - Keep head up.

- Lift with legs.
 - Bring load in close.
 - Push rather than pull heavy loads.
5. Keep all areas and vehicles clean, neat, orderly and free from trash and debris.
 6. Smoking is allowed only in designated areas. Completely extinguish all matches and cigarette butts.
 7. Possessing, using, selling or being under the influence of alcohol, marijuana, hallucinogens or any other drugs or controlled substances on company property at any time, or when on company time away from the workplace, is strictly prohibited and will result in immediate termination of employment.

C. Confidentiality Policy

Policy brief & purpose

Genesee Transportation, Inc. designed the company confidentiality policy to explain how we expect our employees to treat confidential information. Employees will unavoidably receive and handle personal and private information about clients, partners and our company. We want to make sure that this information is well-protected.

We must protect this information for two reasons. It may:

- Be legally binding (e.g. sensitive customer data.)
- Constitute the backbone of our business, giving us a competitive advantage (e.g. business processes.)

Scope

This policy affects all employees, including board members, investors, contractors and volunteers, who may have access to confidential information.

Policy elements

Confidential and proprietary information is secret, valuable, expensive and/or easily replicated. Common examples of confidential information are:

- Unpublished financial information
- Data of Customers/Partners/Vendors
- Patents, formulas or new technologies
- Customer lists (existing and prospective)
- Data entrusted to our company by external parties
- Pricing/marketing and other undisclosed strategies
- Documents and processes explicitly marked as confidential
- Unpublished goals, forecasts and initiatives marked as confidential

Employees may have various levels of authorized access to confidential information.

What employees should do:

- Lock or secure confidential information at all times

- Shred confidential documents when they're no longer needed
- Make sure they only view confidential information on secure devices
- Only disclose information to other employees when it's necessary and authorized
- Keep confidential documents inside our company's premises unless it's absolutely necessary to move them

What employees shouldn't do:

- Use confidential information for any personal benefit or profit
- Disclose confidential information to anyone outside of our company
- Replicate confidential documents and files and store them on insecure devices

When employees stop working for our company, they're obliged to return any confidential files and delete them from their personal devices.

Confidentiality Measures

We'll take measures to ensure that confidential information is well protected. We'll:

- Store and lock paper documents
- Encrypt electronic information and safeguard databases
- Ask employees to sign non-compete and/or non-disclosure agreements (NDAs)
- Ask for authorization by senior management to allow employees to access certain confidential information

Exceptions

Confidential information may occasionally have to be disclosed for legitimate reasons. Examples are:

- If a regulatory body requests it as part of an investigation or audit
- If our company examines a venture or partnership that requires disclosing some information (within legal boundaries)

In such cases, employees involved should document their disclosure procedure and collect all needed authorizations. We're bound to avoid disclosing more information than needed.

Disciplinary Consequences

Employees who don't respect our confidentiality policy will face disciplinary and, possibly, legal action.

We'll investigate every breach of this policy. We'll terminate any employee who willfully or regularly breaches our confidentiality guidelines for personal profit. We may also have to punish any unintentional breach of this policy depending on its frequency and seriousness. We'll terminate employees who repeatedly disregard this policy, even when they do so unintentionally.

Note: This policy is binding even after separation of employment.

D. Enforcement Procedures

Employees are responsible to adhere to all company policies and procedures and to work in such a manner that will prevent injury to themselves, their co-workers, or Genesee Transportation's clients. The Company's intent is not to discipline employees who are involved in non-preventable accidents. GTI's position is to work with employees to make them more safety conscious. Disciplinary procedures are established to deal with employees who disregard company policies and procedures, or who are repeatedly negligent in their duties. GTI's policies and procedures are set up to first warn, then if properly communicated warnings are not heeded, to discipline an employee(s). GTI will not permit negligent behavior that will endanger other employees or clients.

Should there be a violation of GTI policies and procedures, the following disciplinary procedures will apply:

1. **Verbal warning:** Employee will be given a verbal warning for a first offense to a company policy or procedure, if it is minor in scope. A record of this warning will be placed in employee's personnel file.
2. **Written warning:** Employee will be given a written warning for a serious breach of policy or procedure or repeat offenses which were not corrected by a **Verbal** warning. Copies of the written warning are filed in the employee's personnel files.
3. **Suspension:** Employees may be suspended from work duties without pay and with a written warning for continual repeated offenses or severe violations that result in injury to them and others.
4. **Termination of employment:** Employee may be terminated for flagrant violations of company policies and procedures. Flagrant violations may include:
 - Intentional breach of Confidentiality policies.
 - Behavior that is dangerous and puts GTI clients, employees and the general public at risk.

Termination may also occur if employee persists in continued or repeated violations of company policies and procedures or after repeated warnings about at an unacceptable level of performance.

E. Employee Training

The training of employees is vital for a successful Loss Prevention Program. Genesee Transportation, Inc. is committed to providing training procedures that will enhance the employee's efficiency and maintain the highest levels of safety.

Training is not a one-time occurrence at GTI. Continual monitoring, review and feedback between employees and trainers enhance accident prevention efforts. Employees are given explanations of potential hazards to avoid and safeguards to follow. Discussions include a review of safety procedures, along with an explanation of why management feels they are necessary.

Safety training for the transporters includes the following policies and procedures:

1. Hiring Procedure:

- a) Application review to ensure competency and experience operating vehicle and transporting clients
- b) New York State Defensive Driving Performance Test for Drivers under Article 19-A is required
- c) GTI will review the applicant's Driving Abstract to determine if there is a pattern of unsafe driving.

2. New Hire Training

- a) Employee is assigned a Trainer, an experienced transporter, that will review in detail with the employee the "Genesee Transportation Inc. Driver's Daily Pre- Trip and Post- Trip Inspection Report". During this aspect of training, the Trainer will identify all aspects of the vehicle that must be evaluated each day. The Trainer ensures that the Employee is well versed in all aspects of the report and is able to accurately complete the report before and after each shift.
- b) The Employee will review and adhere to the "GTI Driver's Safety Procedures and Policies" (**Exhibit A**).
- c) The Trainer will review with the employee all emergency exits and emergency action plans with the employee to ensure complete adherence to safety regulations in the facility. This review will include safety policies during normal working hours or during an emergency event.
- d) The Trainer shall provide a comprehensive report after riding with the New Hire Transporter to review competence and compliance to safety procedures and policies. The Trainer shall put forward any recommendations, including but not limited to further training, or approval of the New Hire.

It is vital to GTI's Loss Prevention Program that all safety training programs and meetings be carefully documented. Written records of all training activities are the responsibility of the trainer and will be kept in the personal file of the employee.

In- House Safety Inspection Program

Safety inspections are an integral part of program. GTI will conduct inspections to:

- Maintain a safe and healthful work place
- Recognize unsafe work practices
- Detect unsafe working conditions
- Increase safety awareness
- Prevent injuries and illnesses

Everyone must be aware of safety and health conditions. GTI employees will be encouraged to check their immediate work areas regularly. Whenever possible, employees will be encouraged to take steps to fix any problems and report them to direct supervisors.

F. Emergency Action Plan

Emergency action procedures effectively evacuate staff from our building in case of an emergency.

Procedure for reporting On-site Emergencies:

Types of Emergencies to report:

- Fire
- Chemical spill or toxic gas release
- Personal injury
- Other

Emergency Evacuation Routes and Procedures

- Emergency evacuation Routes and procedures (including location of fire extinguishers) are posted in each work area .
- If a copy is not posted, inform the area supervisor; they must promptly post one.
- Supervisors must make sure that all of their staff know the routes and procedures to follow.

Staff Accountability after Evacuation

- Each supervisor must ensure that all of their staff are present after an evacuation.
- Each staff member must report to the evacuation location shown on the evacuation routes posted in the work area.
- The supervisor may make the head count in person, or they may designate someone else to do it.

On-Site Emergency Medical Services

When there is a personal injury, follow these procedures:

Report all injuries to direct supervisor. Basic first aid will be performed on-site. If a staff member needs advanced emergency medical treatment or hospitalization, appropriate arrangements will be coordinated by management.

Exhibit A

“Genesee Transportation Inc. Driver’s Safety Procedures and Policies”

POLICY

It is the policy of Genesee Transportation to purchase and maintain the highest quality vehicles for transporting company clients. GTI is committed to ensuring the safety of the transporter, passenger and general public while traveling in the Company’s vehicles.

PROCEDURES

1. Company Transporters must maintain a valid driver’s license and have it in their possession at all times during working hours. Furthermore, Company transporters must adhere to all New York State and Local laws pertaining to operating a motor vehicle. Licensed drivers will be monitored by the NYS DOT LENS (License Events Notification Service) program and GTI will monitor and review the 19-A driver record.
2. Company Vehicles must not be operated by anyone other than the employee that the vehicle was assigned and shall only be used for Company business.
3. The Employee will not operate any Company vehicle while under the influence of intoxicating drugs or alcohol.
4. The Employee will not operate any Company vehicle while operating a mobile device, either by voice or by text.
5. No personal devices, whether mobile phone, tablet or other device that could impair the driver’s ability to safely transport a passenger is allowed. This includes an employee in the passenger seat and not actively driving a vehicle.
6. Vehicle Safety:
 - a) Safety belts must be worn at all times by transporters and passengers.
 - b) Headlights shall be “on” at all times during the operation of the vehicle.
 - c) Transporters must maintain a safe following distance while driving in traffic. The transporter should consider 4 seconds of traveling distance between their vehicle and the vehicle in front of them.
 - d) Make gradual changes in speed, direction and lane changes. Reduce speed whenever your view is obstructed.

- e) Parking brakes are to be used when “dropping off” or “picking up” a passenger. Furthermore, four-way flashers should be during passenger “drop-off” and “pick-up”.
- f) Turn signals are to be used whenever the vehicle is turning or changing lanes.
- g) Brakes must be applied in a gradual fashion and weather conditions must be considered whenever the brakes are applied.
- h) GTI transporters must abide by posted speed limits at all time.
- i) GTI employees operating a vehicle must ensure that all mirrors are in their proper position so the transporter can review all sides of the vehicle. The transporter must always review their “blind spot” when changing lanes or backing up.
- j) Accidents or citations must be reported to the dispatcher and supervisor immediately. Instructions will be provided to the transporter as per the facts of the incident.
- k) When the Transporter encounters a dangerous or hazardous environment while transporting a client, he must immediately notify dispatch or a supervisor to report the danger. Examples of dangerous environments may be ice or snow on sidewalks, unsafe stairways, unsupervised or aggressive animals. The Transporter must notify GTI’s supervisors if they encounter any potential dangerous conditions.

7. Vehicle Routing:

- a) GTI Transporters will be provided a map of common passenger locations to familiarize themselves with the transportation areas.
- b) GTI Transporters using GPS devices shall never enter destinations into the GPS device while they are operating a moving vehicle. They must enter passenger destinations into the GPS device while the vehicle is parked and obtain the route prior to moving the vehicle.

8. Passenger Transport (Non-Wheelchair)

- a) The Transporter shall perform passenger safety checks prior to moving the vehicle.
- b) Communicate and tend to the needs of the passenger(s) throughout the transfer.
- c) Passengers are to be transported directly to their scheduled destination point even if they request to be transferred to an alternate location. The transporter may only transport the client to an alternate destination if they are authorized to do so by dispatch or a supervisor.
- d) Transporter must remain with the passenger at ALL TIMES until they are turned over to the appropriate personnel at the scheduled destination point.
- e) Passenger Moving Assistance Techniques

- i. Use extreme caution when assisting passengers to and from the vehicle.
- ii. Transporter is never to attempt to lift or carry a passenger to or from a destination.
- iii. Transporter must always assist passenger without bending at their back but using their legs to provide support or assistance.

9. Passenger Transport (Wheelchair Van and Stretcher)

- a) Must be trained on operating the vehicles hydraulic lift including operating the lift manually.
- b) Procedure when loading or unloading a passenger in a wheelchair
 - i. Ensure vehicle is parked in a level and stable area. Also, ensure that the vehicle's parking brake is engaged.
 - ii. Secure the doors of the vehicle to the open position.
 - iii. Apply the brakes on both wheels of the wheelchair after loading on and off the ramp.
 - iv. Communicate to the patient that you're activating the ramp and keep one hand on the wheelchair at all times.
 - v. When the wheelchair passenger is loaded on the vehicle, ensure that all 4 "tie downs" are secured and the passenger's safety belt is buckled.
 - vi. Ensure that the ramp is horizontal with the ground and back the wheelchair on or off the ramp.
 - vii. Secure the lapbelt in the vehicle and ensure that the passenger is comfortable before moving the vehicle.
 - viii. When loading and unloading client on and off the stretcher ensure that the safety brake is on at all times.
 - ix. Prior to moving the stretcher or transporting the client ensure all stretcher straps are properly secured.
 - x. Once the stretcher is loaded on to the van make sure it is positioned within the antlers and the latch is locked before moving the vehicle.