



Lewis Energy Group®

## Vehicle Safety Standard

Lewis Energy Group  
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## **1. Purpose**

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This Vehicle Safety Standard was designed to establish minimum safety requirements for the operation of vehicles used for company (Lewis Energy Group) business. We are committed to providing and maintaining a safe working environment for our Team Members and protecting the citizens of the communities where we conduct business. Operating a vehicle for company business, whether the company's vehicle or your own, is a privilege and, as such, is governed by our policies and procedures. Your commitment to these policies and procedures is vital to building a safe driving culture within our company and ensuring your own safety, the safety of others and the success of the business.

## **2. Scope**

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This standard applies to all Lewis Energy Group (hereafter referred to as the “Company”) Team Members who operate motor vehicles owned, leased, or rented on behalf of the Company.

## **3. Responsibilities**

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### **3.1 “Company” Responsibilities**

The responsibilities of the Company are, but not limited to:

- Determine, order, and maintain Motor Vehicle Record (MVR) background checks on applicable Team Members through the Continuous MVR System
- Ensure those Team Members have valid driving licenses and maintain these records
- Ensure all Company vehicles and equipment are kept in good safe working order
- Implement In-Vehicle Monitoring Systems (IVMS) in Company vehicles to monitor driving behavior and ensure compliance with safety standards.

### **3.2 Health, Safety, and Environmental (HSE) Department**

The responsibilities of the HSE Department are, but not limited to:

- Develop and maintain the Vehicle Safety Standard and related procedures
- Oversee the integrity of the program, ensuring that all team members and management adhere to the Vehicle Safety Standard
- Support the vehicle telematics program for Company vehicles, by monitoring safety events, analyzing trends, and developing ongoing training initiatives
- Manage the Continuous MVR System by monitoring the system, reviewing alerts, and taking appropriate action to ensure the safety and compliance of our vehicle operations, while also ensuring that MVR results comply with the Driver Acceptability Matrix.

### **3.3 Managers / Supervisors**

The responsibilities of Supervisors / Managers are, but not limited to:

- Implement and maintain the Vehicle Safety Standard for their business unit(s).
- Ensure Company vehicles are made available for compliance with the plan.
- Attend Reasonable Suspicion Training in order to better recognize the signs and symptoms of alcohol and drug use.
- Review telematics events, coach vehicle operators, and document each instance of coaching.

- Assist the HSE Department by promptly addressing any MVR issues brought to their attention through the Samba Safety Continuous MVR System, ensuring timely and appropriate actions are taken.
- Actively look for signs of fatigue in themselves and others, including excessive yawning, difficulty focusing, slowed reaction times, impaired judgment, irritability, and changes in communication patterns.
- Schedule driving tasks and routes to minimize fatigue risk, factoring in distance, time of day, and individual needs.
- Create a work environment that encourages open communication about fatigue without fear of repercussions.
- Assess reported fatigue concerns and determine fitness for driving. For more details on Fatigue Management, refer to the **LEG Fatigue Management SOP**.
- Provide alternative work arrangements or rest periods if necessary to ensure safe driving practices.

### 3.4 Team Members

The responsibilities of Team Members are, but not limited to:

- Notify immediate Supervisor / Manager if they are too fatigued or otherwise unable to operate the motor vehicle safely. For more details on Fatigue Management, refer to the **LEG Fatigue Management SOP**.
- Be familiar with the Vehicle Safety Standard.
- Follow all local, federal, and state guidelines, report unsafe conditions, and follow all posted requirements.
- Notify immediate Supervisor / Manager if they are taking medication which could negatively affect their ability to operate a motor vehicle safely.
- Ensure that the vehicle is in proper working condition. If the vehicle is not safe to drive or if previously unreported damage is found, do not operate it and immediately inform your Supervisor / Manager.
- Ensure that they and any Company authorized passengers wear their seatbelt whenever the vehicle is in motion. Seatbelts shall be considered essential personal protective equipment (PPE) and any vehicle with non-functioning seatbelts shall be removed from operation.
- Participate in vehicle safety awareness training both during new hire orientation and as continuing education throughout their time of employment.

## 4. Procedure

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### 4.1 Driving Safety

Team Members which operate a motor vehicle shall have possession of a valid, current driver's license for the type of vehicle being driven.

Only authorized Team Members will drive a motor vehicle in the course and scope of work.

Drivers of vehicles will be appropriately assessed, licensed, and trained to operate the vehicle they have been authorized to operate. Managers / Supervisors shall use the Driver Acceptability Matrix as a reference when assessing drivers.

The driver and all authorized occupants are required to wear seat belts when the vehicle is in motion. The driver is responsible for ensuring passengers wear their seat belts.

Drivers of a truck-trailer combination must either use a spotter, or if a spotter is not available, walk around the truck-trailer prior to backing to ensure no hazards exist.

Vehicle compartments and the cab are to be free from loose objects that might endanger passengers in the event of an incident.

Truck beds must be kept organized with all objects secured properly to ensure no objects can fly out during transit. This precaution is essential to prevent potential hazards to other road users and to maintain the safety of both the driver and passengers.

Drivers of company vehicles must not request or accept payment for carrying passengers or materials. Neither may any company vehicle be used for any enterprise outside the company. For example, company vehicles may not be used for ridesharing or food/package delivery.

Unauthorized transportation or possession of firearms on company locations and/or in a company vehicle is prohibited.

Company property left in vehicles should be secured out of sight to prevent theft. The company will not reimburse the employee for the theft of personal property from company vehicles or personal vehicles used for company business.

Team Members driving vehicles are required to follow these safe driving practices:

- Immediately report any citation, warning, traffic violation, collision, vehicle damage, or near misses associated with the Company vehicle to the immediate Supervisor / Manager & HSE. For more information on reporting vehicle incidents please refer to the **Vehicle Incident Reporting SOP**
- Immediately report any restriction or change (e.g. government restriction, medical restriction, etc.) to your driving privileges to the immediate Manager / Supervisor
- Do not exceed the occupant capacity of the vehicle
- Drive defensively by continually assessing conditions and hazards, and remaining prepared for any situation
- When speaking with a passenger, always keep your eyes on the road
- Do not use handheld cell phones or other electronic devices while driving any vehicle. The vehicle must be safely parked prior to using a handheld mobile phone or two (2)-way radio. See **Mobile Phones and Hand-Held Electronic Devices While Driving** section below
- Using handheld devices to talk, text or email while operating a motor vehicle is prohibited, See **Mobile Phones and Hand-Held Electronic Devices While Driving** section below
- Slow down around construction, large vehicles, wildlife, fog, rain, snow, or anything else that adds a hazard to your driving
- Drive for conditions, not just the speed limit

- Drivers shall not operate a motor vehicle while under the influence of alcohol, illegal drugs, or prescription or over-the-counter medications that might impair their driving skills. For more information on this please refer to the **Team Member Handbook**
- Drivers shall not operate a motor vehicle if they are too fatigued to do so safely. For more details on Fatigue Management, refer to the **LEG Fatigue Management SOP**.
- Alcohol and illegal drugs may not be present in a company vehicle at any time. For more information on this please refer to the **Team Member Handbook**

It is the responsibility of all drivers to ensure the vehicle they are operating is well-maintained and safe to operate. Drivers are to be prepared before leaving as follows:

- Perform 360 walk-around and report any new damage
- Check windshield for cracks that could interfere with vision
- Inspect for vehicle damage and immediately report any damage to the immediate Manager / Supervisor, if not previously observed or reported
- Make sure dirt or mud is removed so that it does not obscure the brake lights, license plate, or identification number of their company vehicle
- Check fuel level to be certain the destination can be reached
- Check to ensure the license plates and inspection tag on the vehicle are current
- Check to ensure there is a valid insurance card in the vehicle.
- When applicable, ensure that there is a non-expired first aid kit and an inspected fire extinguisher in your vehicle
- Ensure you are rested and alert for driving
- Team Members are not to perform repairs or maintenance

#### **4.1.1 Fatigue Management**

At LEG, we value the health and safety of our Team Members. Recognizing that fatigue can lead to incidents, errors, and reduced productivity, we are committed to providing a safe work environment that promotes alertness and awareness.

- Both Team Members and supervisors should actively look for signs of fatigue in themselves and others, including excessive yawning, difficulty focusing, slowed reaction times, impaired judgment, irritability, and changes in communication patterns.
- If a Team Member exhibits fatigue symptoms, they must immediately stop driving or take a break from their safety sensitive task and notify their supervisor.
- The Manager/Supervisor should assess the Team Member's fitness for work and provide appropriate alternatives, such as rest periods, rescheduling tasks, or assigning alternative duties for those performing safety sensitive tasks.

For more details on Fatigue Management, refer to the **LEG Fatigue Management SOP**.

#### **4.2 Mobile Phones and Hand-Held Electronic Devices While Driving**

The use of mobile phones and other hand-held electronic devices interferes with safe performance of driving tasks. Team Members may not use cell phones or other hand-held electronic devices for any reason while operating any type of motor vehicle or any other machinery for work. This includes Team Members who are frequent travelers and those who may

drive incidentally. In emergency situations, Team Members should pull off the road in a safe/legal area to make or receive calls on a mobile phone. Hands-free devices are allowed.

A Team Member who receives a traffic citation or is involved in an incident related to mobile phone or other hand-held electronic device use while operating a motor vehicle on the job, must report it to his/her Manager/Supervisor immediately. A Team Member who is convicted of a traffic violation resulting from using a personal or work-issued mobile phone or other hand-held electronic device while operating a motor vehicle or any other machinery owned by the Company must report the conviction to his/her Manager/Supervisor immediately and will be responsible for all penalties that result from such action. Team Members should understand that failure to comply with this policy could result in disciplinary action up to and including termination.

This policy also serves as notification that in accordance with the Federal Electronic Communications Privacy Act, Company issued devices may be monitored for all lawful purposes: ensure authorized use, quality control, system management, protect against unauthorized access, and verify security procedures. During monitoring, information may be examined, recorded, copied, and used for authorized purposes. All information, including personal information placed on or sent over this system, may be monitored. Use of this system constitutes consent to monitoring for all lawful purposes. Unauthorized use of these devices or non-covered damages that result in costs to the Company will be charged to the team member. Repeated violations may result in disciplinary action.

#### **4.3 Vehicle Requirements**

All Company-owned vehicles shall be fit for the purposes intended and shall be maintained in safe working order.

When transporting loads, the load will be secured, and will not exceed the manufacturers load specifications, or the legal limits for the vehicle.

#### **4.5 In-Vehicle Monitoring Systems (IVMS)**

##### **Vehicle Equipment**

Company will install GPS and IVMS Dash Cam systems in all company vehicles. The installation of these will be coordinated by the Company's fleet management team.

##### **Driver Assignment**

The assignment of Company vehicles will be managed by each department's BU Manager in consultation with the Fleet Management team. Fleet Management and/or BU Managers will maintain a record of drivers assigned to IVMS Dash Cam equipped vehicles and ensure said assignments are kept current in the Samsara system.

##### **Data Access and Usage**

Access to IVMS data will be restricted to authorized personnel only. When an IVMS program is in place, the information gathered will be solely for improving driver behavior and other HSE functions such as but not limited to:

- Monitoring the adherence to Company SOPs
- Review trends

- Track location in emergency situations
- Coaching
- Recognition
- Provide expectations when setting goals and improvement opportunities
- Motor vehicle incident (MVI) reconstruction
- Mileage

Team Members shall not tamper, block, remove, disable, etc. any IVMS installed in a vehicle.

IVMS may track but is not limited to:

- Speed
- Braking
- Acceleration
- Deceleration
- Idling
- Seatbelt use
- Global position

### **Managing the Program**

The HSE Department is responsible for the oversight of the vehicle telematics program. Their responsibilities include monitoring of telematics events, ensuring responsible managers are conducting behavior coaching in a timely manner, analyzing trends, developing ongoing training initiatives and providing progress reports to senior leadership.

Each BU manager which has company vehicles is responsible for reviewing telematics events, coaching vehicle operators and documenting each instance of coaching.

#### **4.5.1 IVMS Program Monitoring**

A driver report / scorecard based on driving behavior will be reviewed on a minimum monthly basis. Drivers should expect to receive feedback from the immediate Supervisor / Manager on their driving habits.

Managers / Supervisors will meet with drivers who consistently score below the minimum acceptable threshold (determined by BU management) to review the IVMS report and driving habits.

Company retains the right to remove (permanently or temporarily) Team Members from vehicles who consistently demonstrate poor driving habits. These drivers may also be subject to disciplinary action as set forth hereinbelow depending on the severity and frequency of the incident(s).

### **4.6 Disciplinary Actions**

The Samsara IVMS system triggers alerts for various safety issues, including but not limited to:

- Speeding
- Harsh Events
- Seatbelt violations (only trigger at speeds of 35 MPH or higher)
- Distracted driving



- Unauthorized vehicle use

To address safety-related alerts triggered by the Samsara IVMS system, the following disciplinary actions may be taken:

1. First Offense: Verbal Warning
  - The employee will receive a verbal warning from their supervisor, emphasizing the importance of adhering to safety protocols.
2. Second Offense: Written Performance Improvement Notice (PIN)
  - The employee will receive a written PIN outlining the specific safety violation and the required corrective actions.
3. Third Offense: Final Performance Improvement Notice (Final PIN)
  - The employee will receive a final PIN, indicating that any further violations will result in termination.
4. Fourth Offense: Termination
  - The employee may be terminated from their position due to repeated safety violations.

The company holds the right to upgrade any of these offenses up to termination if it is deemed by management, HSE and HR to be a major offense. Major offenses can cover a broad range of events and will be handled on a per case basis.

#### **Stipulation for False Alerts**

In the event of a false alert or an alert that could not be avoided due to an error by other drivers on the road (e.g., another driver pulls out in front of you) or due to the nature of the camera's AI functionality, the alert will be dismissed and not counted towards disciplinary actions. This stipulation ensures employees are not unfairly penalized for situations beyond their control. However, dismissed alerts will be periodically reviewed to ensure they were dismissed for a valid reason. This review process helps maintain the integrity of the safety protocols and ensures all alerts are appropriately handled.

#### **4.7 DOT Compliance for Company-Owned CMVs**

To ensure compliance with the Department of Transportation (DOT) regulations for company-owned Commercial Motor Vehicles (CMVs), the following procedures and practices must be adhered to:

##### **Driver Logs (eLogs using Samsara)**

All drivers are required to maintain accurate and up-to-date electronic logs (eLogs) using the Samsara system. These logs must include hours of service (HOS) records, duty status changes, and any other relevant information as mandated by DOT regulations. Drivers must ensure that their eLogs are accessible for inspection at all times.

##### **Vehicle Maintenance**

Regular maintenance of company-owned CMVs is essential to ensure safety and compliance with DOT standards. The maintenance program includes:

- Scheduled preventive maintenance checks.

- Immediate repairs for any identified defects.
- Keeping detailed records of all maintenance activities, including dates, descriptions of work performed, and parts replaced.

### **Pre & Post Trip Inspections**

Drivers are required to conduct thorough pre-trip and post-trip inspections of their vehicles. These inspections should cover all critical components, including brakes, tires, lights, and safety equipment. Any defects or issues identified during these inspections must be reported immediately and addressed before the vehicle is operated.

### **Roadside Inspections**

Company-owned CMVs must be prepared for roadside inspections conducted by DOT officials. Drivers should be familiar with the inspection process and ensure that all required documentation, including eLogs, vehicle registration, and insurance, is readily available. Any violations or deficiencies identified during roadside inspections must be rectified promptly.

### **Additional Compliance Measures**

- **Driver Training:** All drivers must undergo regular training on DOT regulations, safe driving practices, and the use of the Samsara eLog system.
- **Record Keeping:** The company must maintain comprehensive records of driver logs, vehicle maintenance, driver qualification files and inspection reports for the required retention period as specified by DOT regulations.
- **Safety Audits:** Periodic safety audits should be conducted to ensure ongoing compliance with DOT standards and to identify areas for improvement.

Drivers of company CMVs must adhere to all DOT and Federal Motor Carrier Safety Administration (FMCSA) regulations.

## **5. Training**

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Team Members hired to operate a motor vehicle will participate in vehicle safety awareness training both during new hire orientation and as continuing education throughout their time of employment. In some instances, remedial training may also be required. Training may be online, in-class and in-vehicle/behind the wheel.

Company retains the right to require any Team Member it deems necessary / high-risk / borderline to take in-person defensive driving training.

## **6. Definitions**

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### **6.1 Terms**

Company vehicle – Any company-owned, leased, or rented vehicle used for company use

### **6.2 Acronyms**

BU      Business Unit

HSE Health, Safety, and Environmental  
IVMS In-vehicle Monitoring System  
MVI Motor Vehicle Incident  
MVR Motor Vehicle Record  
PPE Personal Protective Equipment

## 7. Document Control Process

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This SOP will be reviewed annually or as necessary, to ensure that the policies and procedures remain current and appropriate. Whenever it is necessary to implement changes to procedures, this SOP will be updated, reviewed and approved. In the event this program describes a process that is no longer followed, it will be retracted from the current file, archived and retrievable for audit purposes. The dates and details of all changes or withdrawals will be documented below.

### Document Change History

Version	Change Date	Change Description	Changed by	Approved by	Approval Date
1.0	1/27/2025	Initial Release			

## 8. Attachments

### Driver Acceptability Matrix

#### *Driver Acceptability Matrix*

# of Moving Violations Within Past 3 Years	Number of Accidents Within Past 3 Years			
	0	1	2	3
0	Clear	Acceptable	Borderline	Prohibited
1	Acceptable	Acceptable	Borderline	Prohibited
2	Acceptable	Borderline	Prohibited	Prohibited
3	Borderline	Prohibited	Prohibited	Prohibited
*Any Major Violations (Past 5 Years)	Prohibited	Prohibited	Prohibited	Prohibited

Borderline	Driver will be placed in a driving improvement program.
Prohibited	Company must prohibit driver from driving company vehicles or using personal vehicle on company business.
Major Violation	Includes, but not limited to, DWI, DUI, OUI, refusing a substance (chemical) test, charges of reckless driving, manslaughter, hit & run, eluding police, any felony, drag racing, having or driving with a suspended license, open container, driving on wrong side of road, interlock device, driving onto closed/controlled access.