

# Safety & Regulatory Compliance Policy

## 1. Corporate Safety Mandate & Scope

Compass Transportation LLC operates with an absolute commitment to safety. No delivery window, broker deadline, or freight rate justifies bypassing a Federal Motor Carrier Safety Administration (FMCSA) or Department of Transportation (DOT) regulation.

This policy applies to all company drivers, leased owner-operators, and dispatch personnel operating equipment under our USDOT authority.

## 2. Driver Qualification (DQ) Files

The company must maintain a compliant Driver Qualification File for every commercial driver before they are permitted to dispatch. Drivers are required to immediately assist safety personnel in updating these files.

- **DOT Medical Certification:** Drivers must maintain a valid DOT Medical Examiner's Certificate. As paper waivers are no longer accepted, medical certifications must be updated directly via the state's electronic MVR system. Drivers must undergo a new physical at least 15 days *prior* to their card's expiration date.
- **Annual MVR Review:** Safety management will pull a Motor Vehicle Record (MVR) for every driver annually. Drivers must sign a certificate of violations. Discovery of un-reported major infractions (DUI, reckless driving, excessive speeding) will result in immediate suspension or termination.
- **English Language Proficiency:** In alignment with FMCSA enforcement updates, all drivers must be able to read and speak the English language sufficiently to converse with the general public, understand highway traffic signs, respond to official inquiries, and complete required records.

## 3. Controlled Substances & Alcohol Policy

Compass Transportation LLC enforces a zero-tolerance policy regarding drugs and alcohol.

- **FMCSA Clearinghouse:** All CDL drivers must be registered in the federal Clearinghouse database. Pre-employment and annual queries will be conducted by management.
- **Testing Pools:** Drivers are placed into a mandatory random drug and alcohol testing pool. If selected, a driver must proceed *immediately* to the designated collection facility upon notification.
- **Expanded Testing Panels:** Testing includes standard DOT drug panels, including recent updates incorporating expanded synthetic opiate and fentanyl testing protocols.

## 4. Hours of Service (HOS) & Electronic Logging (ELD)

Fatigue management is heavily scrutinized during hotshot roadside audits.

- **Daily Limitations:** Drivers must not exceed 11 hours of cumulative driving time following 10 consecutive hours off duty. Drivers may not drive past the 14th consecutive hour of coming on duty.
- **Rest Breaks:** A mandatory rest break of at least 30 consecutive minutes (off-duty or on-duty non-driving) must be taken after 8 cumulative hours of driving time.

- **ELD Mandate:** All trucks operating under company authority must run a certified, active Electronic Logging Device (ELD) linked to the vehicle's engine control module.
- **Short-Haul Exemption:** A driver is exempt from the ELD mandate *only* if they operate entirely within a 150 air-mile radius of their home terminal, report and return to the same location within 14 hours, and maintain a daily timecard detailing hours worked.

## 5. Cargo Securement Standards (FMCSA Part 393)

Because hotshot loads frequently consist of irregular, heavy industrial materials (oilfield pipes, steel beams, heavy equipment), improper cargo securement is our greatest liability.

- **Working Load Limits (WLL):** The combined working load limit of all straps, chains, and binders used to secure a load must equal at least 50% of the total weight of the cargo item.
- **Minimum Tie-Downs:**
  - Articles 5 feet or less and under 1,100 lbs: Minimum of **1 tie-down**.
  - Articles 5 feet or less and over 1,100 lbs, or between 5 to 10 feet: Minimum of **2 tie-downs**.
  - Articles over 10 feet: **2 tie-downs** plus **1 additional** for every extra 10 feet or fraction thereof.
- **Mandatory In-Transit Inspections:** Drivers must pull over and physically check the tension of their straps or chains within the **first 25 miles** of a journey, and repeat this check every **150 miles or every 3 hours** thereafter.

## 6. Vehicle Inspections & Maintenance (DVIR)

Hotshot vehicles pull maximum capacity loads on light-to-medium truck platforms, resulting in accelerated mechanical fatigue.

### Daily Inspection Routine

Drivers are legally required to complete an electronic **Driver Vehicle Inspection Report (DVIR)** at the start and end of every shift.

#### 1. Coupling System Check: Critical First Step.

Visually inspect the gooseneck ball, hitch collar, safety chains, and the emergency breakaway cable. Ensure the breakaway battery is fully charged.

#### 2. Tires and Wheels: High Failure Point.

Check pressure and tread depth on both truck and trailer. Hotshot trailers are notorious for blowing tires. Look for sidewall cracks, bulges, and loose lug nuts.

#### 3. Braking Systems: Stopping Power.

Verify the functionality of both the hydraulic/air truck brakes and the electronic trailer brake controller in the cab. Listen for unusual noise or air leaks.

#### 4. Required Emergency Kit: In-Cab Gear.

Confirm the vehicle contains a fully charged fire extinguisher (securely mounted), 3 bi-directional reflective warning triangles, and spare fuses. Note: Liquid-burning flares are no longer required.

- **Out-of-Service (OOS) Defects:** If a driver identifies a safety defect during an inspection (e.g., frayed strap, broken trailer leaf spring, non-functioning brake light), **the vehicle is grounded**. It cannot move until the defect is repaired and signed off on the DVIR.

## 7. Roadside Inspections & Enforcement Actions

When entering a weigh station or stopped by a state trooper for a DOT inspection:

1. **Immediate Transition:** The driver must immediately switch their ELD device into "DOT Inspection Mode" before handing it to an officer.
2. **Conduct:** Drivers must remain polite, professional, and compliant. Arrogance or combative behavior directly correlates with extended inspection times and higher citation counts.
3. **Reporting:** Drivers must upload an electronic copy of any clean inspection report or citation packet to management within 2 hours of the stop. Clean inspections actively improve our company's CSA (Safety Measurement System) score.