



Driver Safety Policy

Purpose

WhiteWater Express Car Wash ("Company") recognizes that our team members are our most valuable assets and key contributors to our continued growth and success. As such, the Company is committed to providing a safe working environment and preventing workplace accidents.

The purpose of this policy is to establish safe driving expectations and requirements for team members who operate non-commercial motor vehicles (non-CMV) while conducting Company business. This policy is intended to promote safe driving practices, reduce the risk of accidents and injuries, protect team members and the public, and support the Company's insurance and liability requirements.

Scope

This policy applies to all team members who operate non-commercial motor vehicles (non-CMV) for Company business, including but not limited to:

- Company-owned vehicles.
- Leased Company vehicles.
- Rental vehicles used for Company business.
- Personal vehicles used for Company business.

All team members authorized to drive for Company business are required to comply with this policy, applicable federal, state, and local laws, and all Company safety requirements.

Definitions

Authorized Driver: A team member who has been approved by the Company to operate a vehicle for Company business and meets applicable driver eligibility, insurance, and MVR requirements.

Non-Commercial Motor Vehicle (non-CMV): A motor vehicle that does not require a commercial driver's license (CDL) to operate.

Motor Vehicle Record (MVR): An official record of an individual's driving history, including driver's license status, violations, suspensions, and other applicable driving information.

Company Business: Driving performed on behalf of or for the benefit of the Company, including authorized travel, business errands, or other Company-related activities.

Post-Accident Testing: Drug testing conducted following a qualifying accident involving a team member while driving for Company business.

Reasonable Suspicion: A determination based on direct observation of behavior or evidence suggesting that a team member may be under the influence of drugs, alcohol, or another illegal substance.

Preventable Accident: An accident determined to have resulted from actions, inactions, or unsafe driving behavior that could reasonably have been prevented by the driver.

Roles & Responsibilities

Team members authorized to drive for Company business are responsible for:

- Maintaining a valid driver's license for the type of vehicle being operated.
- Carrying their valid driver's license whenever driving.
- Maintaining required insurance when using a personal vehicle for Company business.
- Providing required insurance documentation to Human Resources.
- Providing consent for the Company to obtain an MVR.
- Completing the required annual Driver Safety Course.



- Following all applicable traffic laws and this policy.
- Reporting driving-related incidents as required by this policy.
- Cooperating with required post-accident and reasonable suspicion drug testing.

Supervisors and managers are responsible for:

- Promoting and enforcing safe driving practices.
- Reporting accidents and other driving-related incidents as required.
- Initiating reasonable suspicion testing when direct observations indicate a team member may be under the influence of drugs, alcohol, or another illegal substance.
- Supporting accident investigations and providing required information to Human Resources.
- Addressing violations of this policy in coordination with Human Resources.

Human Resources is responsible for:

- Administering the Company's Driver Safety Program.
- Maintaining required insurance documentation.
- Administering the Annual MVR Audit.
- Coordinating required drug testing through a licensed medical facility designated by the Company.
- Maintaining driver-related records confidentially and in accordance with applicable laws.
- Coordinating the annual Driver Safety Course.
- Reviewing MVR results and identifying high-risk drivers.
- Working with leadership regarding retraining, loss of driving privileges, corrective action, or termination when appropriate.

Procedure

1. Driver Eligibility

Drivers must possess a valid driver's license for the type of vehicle being operated and must keep the license with them at all times while driving.

Only team members who meet the Company's driver eligibility requirements may operate a vehicle for Company business.

2. Vehicle Responsibility

Company Vehicles: The Company is responsible for maintaining Company-owned and leased vehicles in a safe operating condition. Team members are responsible for completing required inspections and promptly reporting any safety or maintenance concerns.

Personal Vehicles: Team members using personal vehicles for Company business are responsible for maintaining the vehicle in a safe and legally operable condition and maintaining required insurance coverage. Team members must report any condition that may affect the vehicle's safe operation.

3. Pre-Trip Vehicle Inspection

Before operating a vehicle for Company business, team members must take reasonable steps to ensure the vehicle is safe, roadworthy, and legally permitted to operate. This includes, but is not limited to, checking:

- Vehicle documentation and registration, as applicable;
- Tires and visible vehicle damage;
- Lights, signals, brakes, mirrors, and windshield;
- Seat belts and windshield wipers;
- Fuel level and warning lights; and
- Required emergency, safety or accident equipment.



Team members must not operate a vehicle they know or reasonably believe is unsafe or not legally permitted to operate. Any safety concern, mechanical issue, warning indicator, or vehicle damage that could affect safe operation must be promptly reported to management.

4. Authorized Business Errands

Team members may use a personal vehicle during work hours for an authorized business-related errand when approved by their manager or other designated Company leader.

When using a personal vehicle for Company business, team members must meet all applicable requirements of this policy, including driver eligibility, required insurance, MVR requirements, and safe-driving standards.

Personal errands, commuting, or other non-business trips are not considered Company business, even when conducted during work hours.

5. Drug and Alcohol Testing

The company maintains a drug-free workplace policy to help promote a safe work environment and reduce workplace injuries. The Company may require drug and alcohol testing in the following situations:

- **Post-Accident:** When a team member is involved in an accident while operating a Company-owned, leased, rental, or personal vehicle for Company business, regardless of fault.
- **Vehicle or Property Damage:** When a team member causes or is involved in damage to a Company vehicle, another vehicle, or Company property while conducting Company business.
- **Reasonable Suspicion:** When a supervisor directly observes behavior or other evidence indicating that a team member may be under the influence of drugs, alcohol, or another illegal substance. Additional requirements are outlined in the Operations Team Member Handbook, Nationwide Edition.

All Team members are required to participate in testing when requested by the Company under this policy.

Testing will be conducted at a licensed medical facility designated by the Company. A positive test result may result in disciplinary action, up to and including termination of employment. Driving under the influence of drugs, alcohol, or any other illegal substance is grounds for immediate termination of employment.

6. Rental Vehicles – Out-of-Market Business Travel

Rental vehicles used for out-of-market Company business travel must be used only for authorized Company business. Only the team members authorized to rent the vehicle may operate it. Standard, compact, or intermediate vehicles should be selected unless a larger vehicle is necessary for carpooling, transporting materials, or another documented business need.

Personal use of rental vehicles is prohibited, including leisure trips, personal detours, or errands unrelated to Company business. Family members, friends, or other unauthorized individuals may not operate the rental vehicle.

Team members using a rental vehicle for out-of-market Company business must have personal auto insurance that provides rental vehicle coverage. If their personal insurance does not provide rental coverage, they will purchase the rental company's available insurance with the Company credit card.

7. Personal Vehicle Insurance Requirements

Team members who use personal vehicles for Company business must maintain adequate liability insurance.



The minimum required coverage is either:

- \$250,000 combined single limit per occurrence for bodily injury and property damage; or
- Split limits of 100, 000/300,000 per occurrence for bodily injury and \$100,000 for property damage.

Team members must maintain insurance that permits the vehicle to be used for Company business.

A copy of the insurance policy's declaration page must be submitted to Human Resources at hr@whitewatercw.com during onboarding, as part of the annual audit, and upon HR request.

8. Annual Motor Vehicle Record (MVR) Audit

The Company conducts an Annual MVR Audit for all team members authorized to drive for Company business.

The MVR audit is used to:

- Verify valid driver's licenses.
- Review driving history for violations or suspensions.
- Identify high-risk drivers.
- Support Company insurance and liability compliance.

Human Resources will initiate the annual MVR Audit each February.

Authorized drivers must provide consent for the Company to obtain their MVR. Records will be evaluated using standardized criteria.

Unsatisfactory MVR results may result in:

- Retraining
- Loss of driving privileges
- Corrective or disciplinary action
- Other action deemed appropriate by the Company

MVR information will be handled confidentially and in accordance with applicable privacy laws.

Refusal to comply with the MVR process may result in corrective action, up to and including termination of employment.

9. MVR and Driving Record Notification

Team members authorized to drive for Company business must promptly notify their manager and Human Resources of any event that may affect their driving eligibility or MVR, including:

- Traffic citations or moving violations
- License suspension or revocation
- License restrictions
- DUI/DWI or similar charges
- Accidents
- Other driving-related matters that may affect their ability to legally or safely operate a vehicle

Failure to report an event that may affect driving eligibility may result in corrective action, up to and including loss of driving privileges or termination of employment.

10. Basic Vehicle Operation Guidelines

Team Members must follow all applicable Company safety requirements when operating a vehicle for Company business, including, but not limited to, the following:

- Seat belts must be worn by all occupants at all times.



- Drive defensively and anticipate the actions of other drivers.
- Obey posted speed limits, traffic signs, and traffic signals.
- Secure the vehicle, including locking the vehicle and applying the parking brake when exiting.
- Take appropriate rest breaks during extended travel, including at least every four (4) hours.
- Do not drive more than 10 hours within any 24-hour period.
- Avoid driving after midnight whenever possible and do not drive when conditions make it unsafe to do so, including when fatigued or drowsy or during hazardous weather or road conditions..

11. Traffic Violations

Team members are responsible for all traffic and parking fines incurred while driving, including when driving on Company business.

Team members must report traffic violations in accordance with the MVR and Driving Record Notification requirements of this policy.

12. Refueling Guidelines

When refueling a vehicle:

- Turn off the engine.
- Never smoke or use open flames.
- Avoid re-entering the vehicle to prevent static discharge.
- Do not overfill the tank.
- Use the pump's latch only as intended and do not force it.

13. Distracted Driving & Electronic Devices

The following behaviors are prohibited while driving for Company business:

- Using a hand-held cell phone.
- Using electronic devices such as laptops or cameras.
- Making or answering calls while driving. Calls should be returned only when stopped.
- Using headphones or hand-held audio devices.

*Hands-free use is permitted **only** when:*

- The device is pre-approved.
- The driver is not required to take their eyes off the road.
- The device can be operated with a single button or while stopped.
- The conversation does not impair safe driving.
- Road conditions are generally safe.

Passengers may handle calls when appropriate. Team members should encourage coworkers not to engage in calls while driving.

14. Emergency Calls

Calls to 911 are the only exception to the hands-free rule.

Emergency calls should be kept brief and conducted hands-free when available. Team members should pull over when possible before making an emergency call.

15. GPS and Audio Devices

GPS use is permitted when:

- The device is securely mounted and does not obstruct the driver's view.
- Voice navigation is used.
- Programming or entering information occurs only while stopped or pulled over.

Music or audio devices may be used when:

- Settings are adjusted before driving or while stopped.



- The driver does not take their eyes off the road to adjust settings.
- Hand-held devices or headphones are not used while driving.

16. Accident Investigation & Reporting Procedures

If involved in an accident while driving for Company business, team members must:

1. Prioritize safety and call 911 or seek medical attention when necessary.
2. Remain at the scene and exchange required contact, driver, vehicle, and insurance information with the other parties involved.
3. Document the accident scene, including photographs of vehicle damage, road conditions, traffic signs, and other relevant details when safe to do so.
4. Do not admit fault or make statements regarding responsibility for the accident.
5. Notify their manager or supervisor as soon as possible and follow the Company's accident reporting process.
6. Complete all required accident documentation and cooperate with any Company investigation, including required post-accident drug testing.
7. Follow additional instructions provided by management or Human Resources regarding the incident and next steps.

17. Annual Driver Safety Course

- All qualified drivers must complete an annual Driver Safety Course.
- The course is distributed annually.
- The training reinforces safe driving practices and compliance with this policy.
- Failure to complete the required training may result in disciplinary action or suspension of driving privileges.

18. Prohibited Driving Behavior

The following conduct may result in suspension of driving privileges and/or termination of employment:

- Driving under the influence of drugs, alcohol, or any other illegal substance.
- Driving with a suspended license.
- Using a vehicle to commit a felony.
- Reckless driving or aggravated assault.
- Hit-and-run incidents.
- Three (3) moving violations within the past three (3) years.
- More than two preventable accidents involving injury or damage within a three (3)-year period.

Documentation & Records

The Company will maintain documentation necessary to administer and monitor the Driver Safety Program.

Records may include:

- Driver's license information.
- Personal vehicle insurance declaration pages.
- MVR reports and related documentation
- MVR consent records.
- Driver Safety Course completion records.
- Accident reports and investigation documentation.
- Required drug and alcohol testing documentation.
- Documentation related to traffic violations.
- Documentation related to driving privileges, retraining, corrective action, or disciplinary action.

Driver-related records, including MVR information and testing documentation, will be handled confidentially and maintained in accordance with applicable laws and Company record-retention requirements.



Team members are responsible for providing updated documentation when required, including insurance documentation upon renewal and information necessary to maintain authorization to drive for Company business.

Compliance & Audit

Compliance with this policy is required for all team members authorized to drive for Company business.

Human Resources will monitor compliance through:

- Annual MVR audits.
- Driver Safety Course completion reviews.
- Insurance documentation reviews.
- Accident and traffic violation reporting.
- Review of driving-related incidents and violations.
- Review of driver eligibility and driving privileges.

Failure to comply with this policy may result in retraining, suspension or loss of driving privileges, corrective action, or disciplinary action, up to and including termination of employment.

The Company reserves the right to immediately suspend a team member's driving privileges when safety, licensing, insurance, MVR, or other compliance concerns warrant such action.

Team Member Acknowledgement

I acknowledge that I have received, read, and fully understand the contents of WhiteWater Express Car Wash's Driver Safety Policy. I understand the responsibilities, expectations, and safety procedures required of me as a team member authorized to operate a vehicle for Company business.

By signing this acknowledgment, I confirm my commitment to safe driving practices and my responsibility to uphold the values and safety culture of WhiteWater Express Car Wash.

Team Member Name (please print): _____

Team Member Signature: _____

Date: _____

Disclaimer:

This policy is intended to provide general guidance and does not create a contract, express or implied. The Company reserves the right to modify, suspend, or discontinue this policy at any time, with or without notice. Where state or local law differs from this policy, the Company will follow the requirements of the applicable jurisdiction.