

Element Fleet Management

Employee Environment, Health and Safety Program
As of July 12, 2017



The Program is developed specifically for Element Fleet Management Corp. and its subsidiaries (collectively, the “Corporation”). It is proprietary and confidential, intended solely for use related to Element Fleet Management Corp. work. The information is broad in nature and is not intended to replace general industry practice and standard operating procedures as may be applicable. Information shall not be shared in any format without the express written permission of the Compliance department. Send requests to the EHS Compliance Director

1.0 Introduction

The environment, health and safety (“EHS”) of our Employees, Workers and visitors is critical to the success of Element Fleet Management. In concert with the Code of Business Conduct and Ethics as adopted by the Board of Directors, Element Fleet Management’s Health and Safety Policy statement is as follows:

“The Corporation is committed to making the work environment safe, secure and healthy for its employees and others. The Corporation complies with all applicable laws and regulations relating to safety and health in the workplace. We expect each employee to promote a positive working environment for all. You are expected to consult and comply with all Corporation rules regarding workplace conduct and safety. You should immediately report any unsafe or hazardous conditions or materials, injuries, and accidents connected with our business and any activity that compromises Corporation security to your supervisor. You must not work under the influence of any substances that would impair the safety of others. All threats or acts of physical violence or intimidation are prohibited.”

The Corporation is committed to compliance with all laws, rules, and regulations. See the Code of Business Conduct and Ethics for further compliance guidance.

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3.0 List of Acronyms

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| AED | Automated external defibrillator |
| ANSI | American National Standards Institute |
| AST | Aboveground storage tank |
| ASTM | American Society for Testing and Materials |
| CFR | Code of Federal Regulations |
| CPR | Cardio pulmonary resuscitation |
| COMAR | Code of Maryland Regulations |
| CSA | Canadian Standards Association |
| dBA | Decibel adjusted |
| DEP | Department of Environmental Protection |
| DLI | Department of Labor and Industry |
| EE | Employee |
| EFM | Element Fleet Management Corp. |
| EHS | Environmental, Health and Safety |
| EPA | Environmental Protection Agency |
| EPCRA | Emergency Planning and Community Right-To-Know Act |
| FMC | Facility Management Company |
| GHS | Global Harmonization System (UN) |
| HEPA | High-efficiency particulate arrestance |
| HR | Human Resources |
| HRIS | Human Resources Information System |

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| HRBP | Human Resources Business Partner |
| JHSC | Joint Health and Safety Committee (Canada) |
| I&I | Injury & Illness |
| LOTO | Lockout/Tagout |
| MPCA | Minnesota Pollution Control Agency |
| OEM | Original equipment manufacturer |
| OSHA | Occupational Safety and Health Administration |
| PPE | Personal protective equipment |
| SDS | Safety Data Sheet (formerly, Material Safety Data Sheet) |
| SVP | Senior Vice President |
| Tier II | A reporting level under EPCRA |
| UN | United Nations |
| UPS | Uninterruptable power supply |
| UW | Universal waste |
| VOC | Volatile organic compound |
| WHMIS | Workplace Hazardous Materials Information System (Canada) |

4.0 Definitions

Air emissions – Pollutants that are emitted into the atmosphere as a result of combustion or emitting operations that affect or impact air quality standards of public health and safety. Common air pollutants are: Methane, carbon monoxide, lead, nitrogen dioxide, ozone, particulate matter, and sulfur dioxide. Air emissions are typically created through use of generators, boilers, VOCs, and motor vehicle operations.

Asbestos Facility Manager – Asbestos Facility Manager is a designated individual(s) responsible for the Asbestos Containing Materials Operations and Maintenance Program.

Business – Means Element Vehicle Management Services Group, LLC, Gelco Corporation, Element Fleet Management (“EFM”), or any of its subsidiaries, affiliates or other related entities.

Competent Person – A competent person is one who has been trained and is capable to identify existing and predicable hazards in the surroundings or work conditions which are unsanitary, hazardous or dangerous to Workers, and who has authorization to implement prompt corrective actions to mitigate work site hazards.

Contractor – An individual under contract to Element to perform services and work for Element. For example, this includes but is not limited to individual Contractors performing IT work as well as Contractors of supplier of labor-pool providers providing administrative Employees for a shortterm contract, and contract legal attorney staff. Generally, a contractor will have an individual agreement with EFM.

EHS Compliance Director – The title of the position responsible for environmental, health, and safety compliance.

Employee – Employee means an employee of Element Vehicle Management Services Group, LLC, Gelco Corporation, its subsidiaries, corporate affiliates, and entities also known as Element Fleet Management (“EFM”).

EHS – Environment, health and safety

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Facility – Means an office Facility that is owned or leased by EFM or the business for which the business is responsible to ensure worker health and safety.

Facility Management Company – Facility Management Company (“FMC”) is the property or Facility management company under written contract or agreement to EFM to provide services to EFM for owned or leased office facilities.

Facility Manager – A Facility Manager is the person responsible for oversight and management of the physical and administrative operations of the Element location. The person may be a supplier such as a Facility management company or property management firm, or a general manager or other titled position at Element.

Guidance – When used in this document, guidance means internal Element Fleet Management advice or information.

Hazardous Material or Dangerous Good – Means a substance or material designated by various federal, provincial, and state regulators that has been determined to be capable of posing an unreasonable risk to health, safety, and property when unintentionally released.

Hazardous Waste – Means a substance that has been designated by the U.S. EPA, Dangerous Goods Directorate, or Secretaria de Comunicaciones y Transportes as a material that meets specific criteria as a hazardous, toxic or dangerous waste and is no longer a viable material for use or recycling purposes.

HR – Means the Human Resources department or the Human Resources Business Partner.

Kitchen/Café – An area equipped for preparing, cooking and serving food staffed by a thirdparty under contract or written agreement with the Business.

Kitchenette/Break-Room/Pantry – A small area equipped with minimal convenience appliances for Employees and Workers personal use to store, prepare or consume food or drink.

Near Miss – A near miss is an event where a worker could have been injured due to a hazard that was present or presented itself during work. It includes an event in which a future Worker may incur injury due to the same circumstances or series of events.

Office – An EFM Facility where the primary work performed is generally business or professional services at a desk or in a group or conference setting.

Owned - Means a site owned by Element, or its related subsidiaries or affiliates, and/or a site occupied by Element wherein Element has a contractual obligation for property and Facility maintenance responsibilities at that site. Owned does not include facilities that are rented or leased solely as office space where Element is a tenant in a multi-tenant Facility.

Remote Employee – An EFM employee working from a location apart from one of the Element offices. Remote Employees are generally working from a personal home-based office as an assigned location. Remote Employees may also be based at a specific office location but travel extensively due to the nature of the Worker’s position. Remote Employees may also be called telecommuters or homeworkers in certain jurisdictions such as Ontario. (Note: Homeworkers are not domestic staff by law.)

Safety Data Sheet – A document in a format prescribed by the UN GHS, U.S. Occupational Safety and Health Administration Hazard Communication, Canada (or Provincial) Occupational Health and Safety Act or Regulations. The SDS is written detail of the hazardous chemical product in sixteen (16) specified sections and is required to be provided by the chemical manufacturer to the purchaser of applicable products.

Security – Security is a third-party company and its employees or representatives at an EFM Facility for the sole purpose of providing security services to EFM.

Standard(s) – When used in this document, Standard means an established federal, provincial or state operative regulatory requirement. In the U.S, OSHA defines standard as follows: “Standard” means a standard which requires conditions, or the adoption or use of one or more practices, means methods, operations or processes, reasonably necessary or appropriate to provide safe or healthful employment and places of employment.” (29 CFR 1910.2(f))

Supplier – A company contracted to perform work or services at an EFM Facility or to represent the Supplier’s employer to our benefit. For example, this includes but is not limited to Facility management companies, painting, cleaning companies and representatives of OEM Suppliers. A supplier will generally have a company or corporate agreement with EFM. A Supplier representative may be on site in a support capacity without written agreement but under applicable authorization, such as an OEM representative relationship.

Telecommute Employees – See Remote Employee.

Temporary Worker – An Element Fleet Management employee hired for part- or full-time work on a temporary basis for a period of time.

Visitor – A person visiting an EFM location as a guest, whether invited or uninvited. For example, a Visitor includes but is not limited to a customer, prospective supplier or prospective customer, supplier, regulator, inspector or other.

Waste – Means a substance that is not designated as hazardous, not recyclable, not reusable, and designated for ultimate disposal not specifically regulated as a hazardous waste.

Worker – An Employee, Visitor, Contractor, Temporary Worker, or Supplier employee.

5.0 General Information

This program provides information with respect to Element Fleet Management Corp. (“EFM”) for North America EHS requirements, expectations, and processes for EFM Employees and Workers. All Employees are expected to comply with all applicable Business policies and procedures. It is the intent and commitment of EFM to comply with all applicable rules and regulations for all Employees and Workers.

Employees and Workers will have access to this program through the applicable Human Resources Information System. Any questions or concerns with respect to this program and its contents should be directed to an Employee’s manager, the EHS Compliance Director, Legal, or the SVP, Compliance.

Employees will be provided information at the time of hire on business health and safety programs, reporting work-related injuries or illnesses, reporting a safety concern or incident, voluntary participation in health and safety related opportunities such as safety committees or health-incentive goals. Recurrent training opportunities may be offered.

Specific Employees with direct need for EHS training based on job functions may also be required to participate in additional training, such as: Personal protective equipment, First Aid/CPR, hazardous materials, universal waste management, storage tank programs, mercury lamp management and others.

6.0 Compliance Expectations

Workers are expected to comply with all business policies and procedures at all times. Workers should follow the Business Code of Conduct and Ethics and should report integrity concerns via the Concern Reporting Standards. All EHS concerns should be reported to your manager or the EHS Compliance Director.

Nothing herein is intended to contravene a federal, state, provincial, or local regulation or other company policy or procedure. Any instances where this may have the appearance of occurring is unintentional and should be raised to the EHS Compliance Director or the SVP of Compliance.

All facilities are expected to follow minimum regulations and the stated policies and procedures. Facilities with specific operational needs may have other program resources analogous to this program to accommodate their work.

6.1 Compliance EHS Audits - Internal

Internal EHS audits may be conducted periodically to ensure compliance. Owned Facilities should expect an internal EHS audit on a three-year cycle. Audits may be desktop or in person, by an EFM Employee or a third-party. A site review may be conducted because of a severe or life-threatening injury or illness, a substantiated Employee complaint of unsafe operation conditions, or at will.

6.2 Compliance EHS Audits – External

A site visit by a regulator representative for EHS purposes should be conducted with care. If the site visit was unplanned and unannounced, credentials of the regulator should be obtained and verified prior to answering detailed questions. Cooperate with the request answering only the questions asked. Any conversation or pictures taken by a regulator become part of the formal record. Notify the EHS Compliance Director or the SVP of Compliance as soon as possible. If pre-notification of an impending site EHS audit or visit is received, contact the EHS Compliance Director or the SVP of Compliance as soon as notification is received.

Certain regulatory requirements provide a very short window of time to produce documents, such as a request from an investigator in response to a work-related fatality. Ensure the nature of the request from the regulator as well as the regulatory authority is understood. For example, a U.S. Department of Transportation audit may be conducted by a state Department of Motor Vehicle investigator under written agreement between the two agencies. However, State DMV investigator's authority does not extend to U.S. Environmental Protection Agency regulations therefore questions and answers should be appropriate to the authority and scope of the inquiry. No response should be submitted

without first consulting with the EHS Compliance Director or the SVP, Compliance. However, all efforts should be made to ensure that we comply with the regulator's requirements within the timeframe communicated by the regulator.

Thoroughly understand the nature of any documents being presented to you for review and signature. If you don't have signing authority to bind the company to a consent order, do not sign but rather have an appropriate senior level manager or Legal address the matter. Contact appropriate Compliance or Legal department representatives before taking such action.

7.0 Acquisitions, Mergers, Tenants and New Facilities

Resource: Acquisitions, Mergers, Tenants and New Facility EHS Guidance document.

8.0 Accident, Incident or Near Miss EHS Reporting*

Any Worker on an Element site who witnesses an accident, incident or near miss should report it to the EHS Compliance Director, Facility Manager, Security staff, or Legal. Reports will be documented either via the First Report of Incident form or via email. Reports must be forwarded to the EHS Compliance Director.

All reports will be investigated and follow-up may be required. Investigations are for the purposes of understanding the circumstances of the accident, incident or near miss, the sequence of events that led to the accident, incident or near miss, and the event itself with the intent to prevent recurrence.

After initial facts are gathered, an analysis is performed to ascertain measures that might have been taken, if any, to avoid the hazard. Future measures will vary based on the cause and effect of the event. Steps may include but are not limited to: Retraining, retooling, repair, replacement of equipment, restatement of safety awareness measures, re-engineering, additional safety or mechanical equipment, terminating a process or work practice or re-designing a work process. Lessons learned as a result of the investigation will be communicated to applicable Employees or Workers.

Resource: Occupational Injury & Illness Prevention and Reporting Program (country specific).

**Accident, incident or near miss does not include motor vehicle use or reports.*

9.0 Asbestos Containing Materials Operations and Maintenance Program

The Eden Prairie EFM Facility has asbestos containing materials in a small number of areas. These materials have been tested and no health or safety related concerns are presented for Workers regarding the undisturbed materials based on the sampling results. Notification was provided to all Employees at this location at the time of test results. If you have questions, please contact a Facility Asbestos Manager; their names and contact information are posted in the display case on each applicable floor on the site.

Resource: ACM O&M Program is incorporated herein by reference.

10.0 Automated External Defibrillators (“AEDs”)

An AED is a medical emergency response device that works by assessing cardiac rhythm. If necessary, it delivers an electric shock to restart the normal rhythm in victims of sudden cardiac arrest. An AED will not work alone if a victim is in full cardiac arrest, meaning no rhythm is discoverable by the AED. In certain cases, a shock can restart or stabilize an abnormal rhythm.

We have voluntarily elected to have AEDs at many sites for the health and welfare of our Employees to affect a quick response in a cardiac arrest situation.

Our AED devices are automated and include audible directions/instructions as soon as the device is opened. AED’s are located on each floor in strategically placed areas or are provided by Security services during response at applicable sites. If there is a concern with respect to the location or placement of an AED, contact Facility Management to discuss.

State requirements must be met at certain locations for registration, maintenance and inspection of the AEDs. See the resource listed below for information if needed. Contact the EHS Compliance Director with questions.

Resource: Automatic External Defibrillator Guidance

11.0 Chemical Management

Element Fleet Management uses chemicals as part of general industry use in building management. Chemicals are a part of everyday life and our use includes those items needed to supply backup power in the event of a power failure, suppressants to extinguish an electrical fire or a grease fire in the Kitchen, water treatments, cleaners and solvents as well as a variety of other common consumer materials in retail packages.

Few Element Employees work with the physical environmental matters that involve chemicals. A Hazardous Communications Program is in place as well as Chemical Spill or Leak Emergency Response Plan and Procedures. Each program is tailored to the applicable location. Special training is provided to Employees that are actively involved in and responsible for work in this area. Any questions should be directed to the EHS Compliance Director or the Manager, Facilities & Real Estate.

11.1 Office Supply Desk Chemical Management

EFM Employees may have a small number of chemicals in your work station. Examples are: Desk cleaner, compressed air for keyboard dust, or glass cleaner. These chemicals are authorized for use at your desk, provided they are in a consumer or retail size package, and are provided by the Business through supply purchases.

Containers at your desk must be consumer or retail size. The package should remain intact with the original label affixed. Any leaking packages should be managed as universal waste. Contact your Facility Manager for further steps.

12.0 Chemical Spill or Leak Emergency Response Plan and Procedures

A few EFM sites require specific plans due to the chemicals onsite. You will be provided with data on these plans if your work is directly involved in this area. Due to the confidential nature of information that is contained in the plan, such as location of materials as well as home telephone numbers of responsible Workers, generally copies will be made available to applicable Contractors, Workers and EFM Employees that have a need to know such as access to the chemicals or responsibility for the management, emergency response, compliance and other requirements of the program. You have the Right-To-Know under the Emergency Planning and Community Right to Know Act (“EPCRA”) in the United States. If you wish to have further information in this area, please contact the EHS Compliance Director.

Resources: Chemical Spill or Leak Emergency Response Plan and Procedures (Sparks, Maryland and Eden Prairie, Minnesota)

13.0 Confined Spaces

EFM is required to identify those areas that meet the OSHA definition of a confined space. EFM has completed this process and it is reviewed on an annual basis by the EHS Compliance Director for any changes. A limited number of EFM Employees have access to areas that meet the definition of a confined space. If a permit-required confined space entry must be performed, the Contractor or Supplier Permit-Required Confined Space Entry Program must be followed. All parties must be aware of and agree to the requirements of the program.

If your work directly involves an area that meets the definition of a confined space, notification is provided regarding the applicable program and requirements. If you have questions, please contact your manager or the EHS Compliance Director.

Resource: Permit-Required Confined Space Entry Program

14.0 Facility Safety & Security

All Employees are required to use the Security and/or badge system for accessing an EFM office Facility. For office facilities that do not have badge access, the specific Security procedures for that office Facility or property should be followed at all times as communicated to the Employee. If you lose or misplace your identification badge, immediately notify Security and obtain a replacement badge.

Visitors to an office Facility shall check-in and check-out with Security and shall be escorted while on premise. Employees should not knowingly allow unknown persons to gain entrance. Contact Security if you suspect a non-authorized person has gained entrance. Do not discuss specifics of EFM facilities with non-EFM people.

The Employee's manager is responsible for following post-termination security procedures. Regardless of circumstances, the manager (or other authorized site party) shall obtain the Employee's badge and notify Security of the termination. Physically return the badge to Security or destroy the badge via cutting or shredding. Frequently, Employees and managers aren't colocated at the same Facility. Therefore, the manager is responsible to ensure that the appropriate site specific Security, HRBP, office manager and/or other key contact has been contacted, is aware of the termination, and will collect the company belongings from the terminating employee.

Any threats against the safety of the Facility or the Facility population shall be immediately reported to Security, a Facility Manager, or another manager.

Employees traveling for business purposes should follow all safety and Security measures outlined in the Element Fleet Management Business Travel and Entertainment Policy.

Employees performing work or services at a host site, such as a customer, prospect or supplier facility, shall follow all business safety and security procedures and the safety and security procedures of the host facility as communicated to them by the host customer or prospect.

15.0 Fire Protection

Fire protection systems and extinguishers are provided in all EFM facilities. Fire protection systems are inspected and maintained on a routine basis. Any concerns or questions should be directed to the Facility Manager or Facility Management Company.

15.1 Suppressant Gases

There are EFM Facilities that contain Hazardous Material compressed gases for fire suppression systems. These gases are specifically designed to quickly suppress a fire by removing all oxygen from the air. These areas are the Café/Kitchen food preparation areas, the title vault(s), the data centers, and the ancillary fire equipment rooms that house the piping, access, and discharge equipment. The system is connected to the general fire alarms and the gas disperses only in the room that is protected. If you hear a fire alarm, exit the Facility immediately.

16.0 General Physical Site EHS Requirements

At a minimum, each owned site shall have:

- Appropriate fire extinguishers and fire extinguishing media/suppressant systems in place.
- First aid kits
- Emergency evacuation notices posted and in place.
- Shelter-in-place, earthquake, tornado or other areas designated.
- Security procedures including visitor check-in/check-out procedures.

- Safety Data Sheets (SDS) for all applicable chemicals on site. □ Labor and safety postings, as required by law
- Sites with corrosives materials shall have eye wash stations readily available in the immediate vicinity to the corrosive material.
- Adequate lighting, heating and cooling for the comfort of Workers and to ensure no hazards are present due to the lack of lighting or HVAC.
- Adequate trash containers for general areas, meeting and conference spaces, restrooms, and individual cubicles and office spaces.
- Adequate recycling bins for paper, plastics, metals and other items as designated or added to a recycling program.
- Adequate potable water for all Workers use and non-potable water for applicable operations.
- Adequate sewer and drainage services at all times. In an emergency, a sewer or water issue may result in business operation issues.

17.0 General Housekeeping and Monthly Inspections

Good business practices for growth include providing Employees a workplace that is a safe and healthy atmosphere. OSHA standards require the same.

Not less than monthly, Facility Management shall perform a documented workplace inspection to ensure the workplace is commensurate with providing Employees, Workers and visitors a place that is safe and healthy. See the General Housekeeping and Monthly Inspections Guidance if needed.

Employees are expected to assist in this endeavor. Keep your work areas relatively clean, use appropriate waste and recycle bins and receptacles, wipe up any spills you create in the kitchenettes or breakrooms, use lavatory facilities appropriately and report significant housekeeping concerns

If you or your department has a storage area, keep all materials stored and secured in a manner that does not create a hazard. Bins, bags, boxes, barrels, totes, or other storage containers should be stacked, blocked, braced, and interlocked (if applicable) to ensure that containers do not create a hazard to Workers in the area. Stacks of stored materials should be limited to a height that does not create a fall hazard. Storage areas must be kept free from accumulation of materials that constitute hazards from tripping, fire, explosion, or harboring pests. Do not block emergency exits or stairwells.

Resource: General Housekeeping and Monthly Inspections Guidance

18.0 Guns and Weaponry

Guns or other weaponry are not allowed in the Facility or on premise at any time regardless of permit. Specific regulatory statute or law, where more stringent, supersedes herein. Any questions or concerns regarding this should be directed to the EHS Compliance Director.

19.0 Emergency Exit Routes

Emergency exit routes should not present a hazard to Employees and Workers. Exit routes should always be free and clear of debris. No materials should block an exit route even on a temporary basis. This includes decorations. Exit doors should not be chained, padlocked, or contain a deadbolt at any time. The passageway and/or stairwells to the emergency exit should always be kept free and clear of any debris, decorations, or any material that could impede an emergency exit.

Safeguards to protect Workers during an emergency exit must be in place at all times, such as a fire sprinkler system. Exit routes should have adequate lighting at all times, including in a power failure, to ensure that exit is not impeded. Each emergency exit must be clearly marked "Exit". Exit signs will not be obscured in any manner, such as with decorations, banners or other material.

Exit routes must be maintained during construction, renovation, repairs or other Facility work. If the Facility work will make the emergency exit unusable to Employees and Workers, then Employees and Workers are not allowed to occupy the space and must be relocated from the area until such time the emergency exit becomes usable. Construction or repair Workers must be instructed in the appropriate emergency exit to use and their passageway to the exit should be unobstructed, clearly identified, labeled and lighted appropriately to the applicable standard.

A distinctive alarm system must be maintained to ensure that Employees and Workers are signaled when to exit the building. An alarm system or process must accommodate the visually or audibly impaired and provide an alternative means of notification so the impaired colleague can safely and quickly utilize the nearest emergency exit.

Emergency exit doors should be locked from the exterior to maintain building security - no padlock, chain, bolt or another additional device shall be added to an exterior emergency exit door.

20.0 First Aid and Designated First Aid Responders/First Aiders

Each of the EFM facilities have a nearby clinic, hospital, urgent care or other medical Facility that can provide trained and skilled medical assistance to an injured or ill employee or worker. First aid is specifically defined under most federal and provincial standards. First aid is emergency care provided for injury or sudden illness before emergency medical treatment is available.

20.1 First Aid Supplies

Adequate first aid supplies are readily available by contacting Security at the main facilities. At other facilities, a JHSC member, First Aid representative, the Office Manager or Office Administrator, or site supervisor has access to first aid supplies. Supplies should be readily available for use and emergency access. Supplies should not be locked in a cabinet or in a locked office.

First aid supplies must be inventoried as required under applicable regulation and a written record of the inventory must be retained. Quarterly review is recommended absent a monthly regulatory requirement. Supplies should be restocked when needed.

Restocking should not wait until a supply has been fully exhausted. When this occurs, supplies may be needed before the replenished stock arrives. Supply checks should include checking for expiration dates, if applicable.

Absent provincial or federal law stating the absolute requirement for first aid kit contents, at a minimum, first aid supplies should include:

- Adhesive bandages, various sizes
- Gauze
- Antibiotic ointment
- Ice packs (disposable)
- Latex (or other) plastic gloves
- Topical analgesics
- NSAIDS
- Acetaminophen
- Elastic wraps, e.g. Ace® bandage
- Scissors
- Tweezers
- Adhesive tape
- Wound cleaning agents, such as sealed moistened towelettes

Eye wash stations or supplies are provided where Workers may be in contact with corrosive materials. The eye wash stations are generally located near or in the UPS battery rooms. Employees are not expected or anticipated to be in contact with corrosive materials. There are two exceptions to this due to the nature of the duties of the work for these positions: Manager, Facilities & Real Estate and the EHS Compliance Director.

20.2 Designated First Responders and First Aiders

The Security service Workers at the main facilities are the trained designated First Responders in all aspects of first aid. They should be contacted for any major health related first aid needs. Basic first aid/CPR training has been provided to certain EFM Workers. Each person is required to ensure they maintain their training or have their training updated as required.

20.3 Bloodborne Pathogens (“BBP”)

Regulatory standards require an employer to develop and implement an exposure control plan when Employees may be exposed to bloodborne pathogens as part of their job duties and responsibilities. This includes developing and enforcing the plan, enforcing the use of personal protective equipment, offering a hepatitis B vaccine, evaluating exposure, following-up on cases, and using signs and labels for potential hazards. Security services Workers can respond to a BBP injury. The Security staff has been trained by their employer in BBP standards; the EFM Employees have not had BBP training.

EFM is not in the health care industry, nor do we operate laboratories or work where Employees can be reasonably expected to encounter bloodborne pathogens as part of their job responsibilities. If an Employee responds to an incident that may have bloodborne pathogens or the potential for bloodborne pathogens, the Employee is responding as a Good Samaritan and in that capacity only.

**20.4 Automated External Defibrillator (AED”)
devices.** See the AED segment of this program.

20.5 Volunteer First Responders/EMTs

There may be Employees and Workers on site who have extensive training as volunteer First Responders or EMTs for volunteer fire departments or community aid programs. If an Employee with these advanced skills responds to an incident on an EFM site, they are doing so as a volunteer in a Good Samaritan capacity. EFM doesn't have an expectation or requirement that the Employee must self-identify and use these skills to respond to an incident if they are not designated as a First Responder by EFM. We do not gather or maintain a list of Employees who may have this type of skilled training and experience.

21.0 Hazard Communication Program

EFM has a Hazard Communication Program for sites that meet the required criteria due to hazardous materials use and storage on site. The EHS Compliance Director reviews the plan on an annual basis or as material changes are made at the site.

A limited number of Employees have access to areas that contain hazardous materials. If your work directly involves this area, notification and training is provided to you regarding the applicable program and requirements. The program is included herein by reference. You have the Right-To-Know under EPCRA in the United States. If you wish to have further information in this area, please contact the EHS Compliance Director. The plan may be individually reviewed with you. If you have questions, please contact your manager or the EHS Compliance Director.

Resource: Hazard Communication Program

22.0 Ionizing Radiation Equipment

Ionizing radiation equipment presents certain hazards and has requirements that must be followed to ensure worker protection and safety, compliance with regulations that may exist, and best equipment utilization. Ionizing radiation equipment includes but is not limited to: Postal x-ray machines, package scanners, certain automotive diagnostic devices, inspection equipment, diagnostic repair equipment, or Security scanning equipment. At this time, EFM does not own, lease or utilize any ionizing radiation equipment.

Any potential device procurement, lease or use should consider potential worker hazards, regulatory requirements, operations and management concerns prior to contract or agreement execution and use.

Contact the EHS Compliance Director for consideration of this type of equipment.

23.0 Ladders

Element Employees and contractors use ladders from time to time to perform their work.

Employees who use ladders in excess of 4' must have training as required by law. At this time, a limited number of Employees are authorized to use only a step ladder for work at heights in excess of 4'. These Employees must receive ladder safety use education.

23.1 Portable ladders

- Ladders shall be in good working condition. Any ladder not in good condition should be removed from service and either replaced or repaired. Any Employee using a ladder for work as required by their position must complete the Ladder Safety Program review and training, applicable to their respective country, prior to performing work using a stepladder.
- Any Employee voluntarily using a stepladder or step stool to perform non-mandated activities, such as hanging holiday decorations, does so at their own use and discretion. If doing so, EFM expects the Employee to use good safety practices and sound judgement.

Resource: Ladder Safety Program, country specific

23.2 Fixed ladders

- Certain Facility locations may have affixed ladders with handrails and steps/rungs.
- Ensure the fixed ladder is in good working condition, all bolts or other fixture mechanisms are in place and sturdy. Ensure no grease, oil, grit or dirt that could prevent a firm foothold and cause a slip is present.
- Follow customary maintenance and housekeeping requirements.
- It's expected that authorized Supplier employees may use the fixed ladders to perform work. No EFM Employee is authorized to utilize fixed ladders at this time. Appropriate safety training and a written program is required.

24.0 Lockout Tagout (“LOTO”)

The program with respect to Lockout Tagout applies to any Business Employee whose work directly involves repair or service of energized machinery or equipment. If your work is in this area, please contact the EHS Compliance Director.

25.0 Machinery and Equipment Program

The program with respect to machinery and equipment is applicable to any Business Employee with job responsibilities directly involving service or repair of machinery and equipment, such as saws, drills, compressors, engines with exhaust or compression displacement, etc. If your work is in this area, contact the EHS Compliance Director.

26.0 OSHA Injury & Illness Prevention and Reporting Program

See the program in the HRIS tool applicable to your country.

27.0 Personal Protective Equipment Program

There are a limited number of Employees that are required to use personal protective equipment (as defined by OSHA standard) in the performance of their job function. If you are one of these Employees, specific guidance will be provided to you. Contact your manager or the EHS Compliance Director with any questions.

Resource: Personal Protective Equipment Program, and Hearing Conservation and Occupational Noise Exposure Guidance.

28.0 Recreational Grill Use

Grill(s) are provided at certain facilities for business related Employee functions, e.g. celebrations, R&R, meetings with lunch provided, and use is voluntary. The grills are not for personal Employee use and may not be removed from EFM property except for repair or replacement.

If your Facility requires that you contact Facilities to reserve a particular location at the building for your event, follow those procedures.

If weather permits, grill use is available during the months of April through October. The Facility Management Company (“FMC”) for EFM is responsible for maintaining the grill and the propane gas supply. The FMC is not responsible for maintaining a gas supply during other times of the year. The FMC is responsible to ensure the tanks to the grill are hooked up, function properly, changing out the tanks if needed, etc. A week’s notice to the FMC must be provided so the FMC has ample time to ensure the grill is operational and a supply of gas is obtained if the tank is low.

General:

- Limited grill tools may be provided by Element, e.g. spatulas, kitchen tongs. EFM doesn’t supply oven mitts, disposable or other pans, etc.
- Ensure the lid is open before turning on the gas and pressing the ignition switch to light the grill. □ If the grill flame goes out or the gas is flowing but the igniter switch isn’t working, let the gas dissipate for at least 5 minutes before trying to re-start the grill. If it won’t light/re-light, contact Facilities.
- To keep excess gas from leaking, turn off the tank valve first, then turn off the grill burners.
- Before using the grill, know where the nearest fire extinguisher and telephone are in the event of an emergency.
- The department manager/group leader is responsible to ensure that the person assigned to use the grill is knowledgeable in its operations and appropriate safety procedures. If they are not, another person should be assigned. The FMC can provide basic instructions on operating the grill if needed.
- Grills should not be used near flammable or combustible materials, inside or within 25’ of the buildings.
- Loose clothing, long hair/beards, loose jewelry or lanyards should not be worn by the person operating the grill. Remove the lanyard or jewelry. Roll-up sleeves, tie back long hair, etc. The Employee should take precautions to ensure their safety and the safety of their co-Workers.

- The FMC is not responsible for cleaning the grill. Employee's must clean the grill after their department or group uses it.

EFM is not responsible for voluntary events and expects Employees to use good judgment and report any unsafe acts.

29.0 Remote/Telecommute/Homeworker Employees

Remote, telecommuting, or homeworker Employees should ensure their work area and work space is a safe and healthy environment. This includes ensuring personal security as well as the security of data and property that may belong to EFM. For your personal safety, ensure that you follow good housekeeping practices. Chairs, desks and tables should be in good, stable working condition. Cords and cables should be tucked away where there isn't a possibility of creating a trip or fall hazard. Lamps and lights should be in good working order. Computers and accessories should be operational and secured at all times.

30.0 Safety Committee/Joint Health and Safety Committee

Our success depends on the ability of our Employees to positively contribute to our customer's growth every day. To do this, Employees must have many tools at their disposal, which also includes a safe work environment. A Safety Committee is a strong and meaningful contributor to business success.

The purpose of the Safety Committee is:

- Promote safety among Employees.
- Review high level reports of safety incidents or near misses.
- Identify future changes or modifications that may have a significant impact on worker's safety on the job, being aware of all measures necessary for safety improvement(s). Act on the improvement measures accordingly.
- Comply with applicable regulations that may require a Safety Committee or a Joint Health and Safety Committee.
- Report, share or forward reports of any safety concerns or events to the applicable person(s).

30.1 Operations □ The Safety Committee ("Committee") is comprised of members from all levels of Employees and shall have no more than eleven (11) members and not less than five

(5).

- The EHS Compliance Director or JHSC Committee Chair will act as the Chairperson, establish the agenda, and schedule/call and conduct the meeting.
- The Committee members and the Chairperson will conduct the applicable business of the Committee.
- Certain positions shall automatically be included in the Committee based on their field of work: EHS Compliance Director, SVP Human Resources, and the Manager, Facilities & Real Estate.
- Certain contractor and supplier positions shall be included in the Committee based on their service to EFMS: Security Manager/Supervisor (major sites) and the Facility Manager.

- Committee members, except as noted, will be volunteers from the employee base. Tenure for volunteer positions will be for a 12-month period, renewable if agreed to by the volunteer and the Committee Chairperson.
- If no or insufficient voluntary participation requests are received, the Committee will then pursue members from a selected group of individuals to represent applicable jobs/positions within the business locations.
- The Committee will meet not less frequently than quarterly. Additional meetings may be held as necessary.
- Committee meeting minutes will be taken and distributed to attendees. At a minimum, the agenda for each quarterly meeting will include: De-identified review of the incident and illness reports, de-identified review of safety near misses or concerns received, updates on safety programs, security related concerns, regulatory changes that are applicable to the safety functions of the business and properties, and any other information applicable to a safety committee review.

31.0 Sanitary Conditions

All Workers are entitled to and have a right to expect healthy and sanitary work conditions.

Housekeeping and janitorial services will keep the facilities as clean as possible with respect to the work being performed. Please take reasonable steps to assist them in this work by keeping your work area neat and tidy, the floor unobstructed, and report any safety concerns to your manager, such as protruding nails, loose flooring, etc.

Office waste will be removed from the waste disposal container in work areas daily.

Vermin shall be controlled through prevention via housekeeping and maintenance services, and if necessary, through an extermination program. Feeding any wildlife animals is discouraged because this activity attracts rodents, insects and other vermin closer to our facilities which may result in vermin inside buildings.

Employees are not allowed to have pets or animals on the property. Service dogs may be authorized with prior consent from the SVP of Human Resources in order to accommodate those with special needs. However, appropriate precautions and pre-check determinations must be made to ensure that co-Workers with severe allergies, if any, are identified to ensure all Workers potential safety or health issues are addressed.

Potable water shall be provided for drinking, food preparation, cleaning, and washing purposes. Non-potable water shall be provided for purposes of flushing, fire extinguishing, and lawn care services. If potable water services are interrupted, toilet services, or fire extinguishing use become inoperable, Workers may be required to work from alternate locations or may be instructed to end their work day early or start late. Showers services are not required on premise due to work-related functions in any of our locations. Clothes washing facilities are not required on premise in any of our locations.

Mothers' rooms are provided for nursing mothers solely for the purpose of expressing and storing milk. Mother's rooms are not sick rooms and should not double for any other purpose than to accommodate nursing mothers. Any concerns should be discussed directly with your HRBP.

Employees are not authorized to paint, nail, drill, or otherwise significantly modify any office or cubicle area. Contact Facilities with requests.

To ensure safe, sanitary conditions, Employees may not have personal refrigerators, microwaves, hot plates, toasters, kettles, induction burners or other cooking or food storage appliances in their immediate work area, cubicle or office. Shared kitchenettes and break-rooms may be provided in various areas of each Facility for your use in storing and preparing food for personal consumption. For department or other small events, Employees may use items such as a crockpot as an exception the day of the event only. However, Employees are expected to ensure their appliance is in good operating condition (e.g. no frayed cords), Employees will clean up after themselves and/or their department event, and will not bring in items that will involve wet frying (e.g. grease splatters). In addition, for items that may involve multiple appliances, such as a cook-off competition, contact Facilities if necessary to arrange for surge protectors to ensure adequate outlets and circuits are used and circuitry is not overloaded.

32.0 Storage Tanks

Storage tanks are used for certain hazardous materials and are regulated by applicable states. Employees with job responsibilities involving the operation, maintenance, and emergency response procedures will be provided specific guidance commensurate with your work. If there are questions, please contact your manager, the EHS Compliance Director, or a Facility Manager

Resources:

AST Operations Management Guidelines U.S., AST Inspections Checklist, Aboveground Storage Tank Protocol

33.0 Universal Waste (“UW”)

EFM creates universal waste. Materials qualifying as “universal waste” include: Batteries, lamps (light bulbs), mercury-containing equipment, and pesticides. These materials are called “universal” waste because almost all businesses will generate them during the normal course of operations.

EFM is a very small quantity UW generator. Increasing to a larger generator category creates additional requirements. EFM wants to create the smallest universal waste footprint we possibly can through best practice sourcing and assessment prior to purchasing, purchasing only what is needed, reuse where possible, recycle where available, and revisit programs on an annual basis to ensure best practices and compliance with regulations.

EFM has a Universal Waste Management Program. The program is reviewed on an annual basis by the EHS Compliance Director. If your work directly involves managing UW, you will receive training.

Resource: Universal Waste Management Program

34.0 Universal Waste Lamps and Mercury Bulbs Management Program

EFM creates waste lamps and bulbs and must take appropriate steps to ensure that our Employees, Contractors and Suppliers are adequately protected from the hazards that these materials can create.

In addition, as a generator of universal waste lamps and mercury bulbs we are allowed to manage these under certain regulatory exemptions providing specified procedures are followed. If certain procedures are not followed, the material may not be managed as a UW.

EFM has a Universal Waste Lamp and Mercury Bulb Management Program. The program is reviewed on an annual basis by the EHS Compliance Director. If your work is directly involving the management of Universal Waste you will receive training

Resource: Universal Waste Lamp and Mercury Bulb Management Program

35.0 Workplace Violence and Workplace Harassment Policy

EFM believes in the prevention of workplace violence and prohibits workplace harassment. EFM promotes a violence-free workplace in which all people respect one another and work together to achieve common goals. The Workplace Violence and Workplace Harassment Policy and Program are in the HRIS and are included by reference herein.

36.0 Governance

Exceptions to this Program shall be reviewed and approved by the SVP, Compliance. Questions regarding the appropriate interpretations of this Program shall be directed to the EHS Compliance Director. This Program shall be reviewed on a periodic basis or at the determination of upon change in applicable law, or in applicable business lines, products, processes or practices.

37.0 Document Change History

| Version | Date | Changes |
|---------|------------|------------------|
| 001 | 07/12/2017 | Initial document |