

THE INITIATING EVENT

- I. As a result of the New Haven Public School's Head Start programs report to the Office of Head Start, giving notification of an inappropriate release of a student by the transportation contractor, First Student Bus Company, the Administration for Children and Families conducted a monitoring review.
- II. Head Start Monitoring Review- The RAN review took place on March 18, 2025 and the New Haven Public Schools received notification on March 27, 2025.

Findings from the review of the two significant health and safety incidents included:

- a. Deficiency in the area of Program Operations, Safety Practices 1302.47(b)(5)(iv). Specifically, the program did not develop and implement a system of management, including ongoing training, oversight, correction and continuous improvement that includes policies and practices to ensure all facilities, equipment and materials, background checks, safety training, safety and hygiene practices and administrative safety procedures are adequate to ensure child safety. This system must ensure: (5) Safety practices. All staff and consultants follow appropriate practices to keep children safe during all activities, including at minimum: (iv) Only releasing children to an authorized adult. (30 days timeframe for correction)
- b. Noncompliance in the area of Program Operations, Personnel policies 1302.90((1)(ii). (c) Standards of Conduct Specifically, the program did not ensure all staff, consultants, contractors, and volunteers abide by the program's standards of conduct that: (ii)Ensure staff, consultants, contractors, and volunteers do not maltreat or endanger the health or safety of children, including, at a minimum, that staff must not engage in behaviors that maltreat or endanger the health and safety of children, including at a minimum (A) Corporal Punishment (B) Sexually abusive behavior (C) emotionally harmful or abusive behavior (D) Neglectful behavior (120 days timeframe for correction)

III. Finding Details

- a. The grant recipient did not ensure staff followed appropriate safety practices to keep children safe during all activities, including only releasing children to an authorized adult.
- b. The grant recipient did not ensure all staff refrained from behaviors that had the potential to maltreat and endanger the health and safety of children.

THE CORRECTIVE ACTION PLAN FOR INAPPROPRIATE RELEASE-TRANSPORTATION

- I. Share notification of deficiency with all stakeholders (NHPS Administration and Department of Transportation, Head Start Policy Council, NHPS Board of Education)
- II. Conduct a Root Cause Analysis and Risk Assessment
- III. Create Action Plan, Implement and Monitor progress regularly
- IV. Norm understanding of HSPPS by key leaders (Director of Early Learning, Head Start Director, Head Start Assistant Director, NHPS Director of Transportation, Dr. Reginald Mayo School Principal, Dr. Reginald Mayo School Assistant Principal)
- V. Review existing Head Start and district bus policies and procedures, amend as needed
- VI. Meet with administration of First Student Bus Company to review their internal safety training, procedures and protocols (including evidence and documentation)
- VII. Examine Recordkeeping and Reporting
- VIII. Establish Re-Training Time Line for First Student Drivers and Monitors
- IX. Collaboratively with First Student Bus Company, develop a plan and system including timeline for shared on-going monitoring
- X. Share plan of quality improvement and risk management with all stakeholders (NHPS Administration and Department of Transportation, Policy Council, Board of Education)
- XI. Publish any changes in policies, protocols and procedures in district and Head Start handbooks

THE CORRECTIVE ACTION PLAN FOR PERSONNEL POLICIES: STANDARDS OF CONDUCT

- Share notification of noncompliance with all stakeholders (NHPS Administration and Department of Early Learning, Head Start Policy Council, NHPS Board of Education)
- II. Create Action Plan, Implement and Monitor progress regularly
- III. Conduct a Root Cause Analysis and Risk Assessment
- IV. Norm understanding of HSPPS by key leaders (Director of Early Learning, Head Start Director, Head Start Assistant Director, NHPS Director of Human Resources, Lincoln Bassett School Principal, Lincoln Bassett School Assistant Principal)
- V. Review existing Head Start and district code of conduct and procedures, amend as needed
- VI. Meet with administration of Head Start to review their internal safety training, procedures and protocols (including evidence and documentation)
- VII. Examine Recordkeeping and Reporting
- VIII. Establish Re-Training Time Line for teaching staff
- IX. Collaboratively develop a plan and system including timeline for shared oversight and on-going monitoring
- X. Share plan of quality improvement and risk management with all stakeholders (NHPS Administration and Department of Early Learning, Policy Council, Board of Education)
- XI. Publish any changes in policies, protocols and procedures in district and Head Start handbooks



Head Start Bus Policy and Protocols

RESPONSIBILITIES OF SCHOOL-Dr. Reginald Mayo School

A.M. bus runs-

- 1. Students disembark from the bus with support, in a well supervised area
- 2. Classroom personnel collect their assigned children and check them in on their classroom bus roster
- 3. Children are walked to their classroom and checked in again, walkers and bus students present are merged onto active supervision roster for the day

P.M. bus runs-

- 1. Students exit classroom with supervising adults, walkers and bus students are separated into the appropriate dismissal area
- 2. Supervising adults check off students as they board the bus, utilizing the morning bus roster

School Leadership-

- School provides all bus students with a colored bus tag to match with their corresponding
 assigned bus (For example, all students who ride the yellow bus wear a yellow tag). Tags are
 changed when new bus information becomes available.
- School remains staffed to receive any telephone calls or bus inquiries until receiving notification that all buses have cleared
- School will assume responsibility for notifying families that their children being returned to school
- School is responsible for receiving and actively supervising all returned students
- School will verify the authorization of any adult picking up a returned child, requesting photo identification if necessary
- School will notify the Head Start Director immediately of any bus related incidents

RESPONSIBILITIES OF PARENTS of Pre-school Aged Children

- 1. Parents/guardians will sign and agree to terms of Head Start Bus Policy
- 2. Parents/guardians are expected to have students ready at least ten (10) minutes prior to the scheduled pick up time. Parents/guardians are expected to be at bus drop off ten (10) minutes prior to the scheduled drop off time
- 3. Parents are expected to receive children or arrange to have a designated adult with photo identification at the bus drop off point. If a child is returned to school because no one received him/her or the receiving adult is not listed or does not have proper identification, it is the parent's responsibility to arrange transportation home



- 4. Home/cell telephone numbers and at least one emergency number must be made available to your child's school. Families will complete the emergency pickup authorization form and will accept responsibility for updating as needed
- 5. In the event there is a family crisis, parents must assume the responsibility for notifying school officials and arranging alternative plans for pickup of child returned to the school

RESPONSIBILITIES OF DRIVERS and BUS MONITORS of Pre-school Aged Children in addition to First Student Pre-trip and Post-trip safety procedures (see following page for First Student driver protocol)

- 1. Bus monitors will check students onto the bus each morning.
- 2. Bus monitors will secure each student into their five-point harnessed car seat.
- 3. Bus monitors will check students onto the bus each afternoon at dismissal
- 4. Bus monitors will have an identified adult sign for the child at the bus stop when dropping off.
- 5. Bus monitors will return all completed bus sheets for the week to the Dr. Mayo School

STEPS to Prevent Inappropriate Release

When an unknown adult is at the bus stop:

- Ensure the person picking up is over 18 years of age
- Request picture identification
- Verify permission- allowing authorization to release child to the adult- check transportation authorization form can be verified through PowerSchool portal
- Call the Dr. Reginald Mayo School if assistance is required
- If verified, release child and obtain signature
- If the adult is not authorized, call First Student base/ dispatch and Dr. Mayo School giving notification that the child will be returned to school
- Return child to the school, obtain signature from receiving school staff

When a bus stop/drop off location is in question:

- Check the run sheet for designated drop off location
- Call First Student base to ensure there are no updates or changes to the run sheet
- Call the Dr. Mayo School to verify there are no extenuating circumstances or changes
- Do not release student at any unauthorized location/facility not listed on the rum sheet or to any adult not listed on the pickup authorization form
- Return student to Dr. Reginald Mayo School, obtain signature from receiving school staff



First Student Bus Company Safety Policies and Procedures

- Pre-trip procedures Each driver is issued a tablet for documentation and recording. The tablet responses are linked to safety procedures and bus inspections, as well as, their payroll system.
 The pre-trip review allowable time is five -seven minutes and must be performed daily. The bus will not operate until the process has been completed accurately.
- 2. Post trip safety procedure-After each school drop off the driver must go do a child check of each seat from the front of the bus to the back of the bus, at the back they scan the bar code into the tablet to register completed the child check.
- 3. The notifications of the authorized persons at the bus stop are given to the driver as well as any updates on the route at the beginning of run. If the driver has a question or is unsure of the information, they will call base. The base can look up student pick up information in the PowerSchool database. Substitute drivers receive information with the route sheet when they are given the run. If the adult's name does not appear in the database the school is notified the student is returning to school.
- 4. Drivers on Board evaluation New drivers have evaluations at the 30-day, 60-day and 90-day points. Existing drivers are evaluated annually, usually near their hiring date anniversary.
- 5. Progressive Disciplinary action Drives are represented by the SEIU Service Employees International Union. Progressive disciplinary results can vary from a verbal warning to termination. First offenses are given a written warning with the letter placed in the employee file. Retraining is required. Second offense a suspension of three days. Third offense termination of employment.
- 6. Safety meetings drivers must attend ten (10) virtual safety meetings a year on a variety of topics. They must log in and log out of their tablets to verify attendance.
- 7. Head Start Parent logs and school logs must be signed daily.

A	В	C	D	E
	Quality Improveme	ent Action Plan for Compliance With Safety Practice : Inappropriate Release		
		training, oversight, correction and continuous improvement that includes policies and practices nsultants follow appropriate practices to keep children safe during all activities, including at mir	to ensure all facilities, equipment and materials, background checks, safety training, safety and hygiene pra nimum: (iv) Only releasing children to an authorized adult. (30 days timeframe for correction)	ctices and
3	District Level Action Steps	Head Start Programwide Action Steps	Responsible Parties	Timeframe
4 Executive Management/Administration Organizational Commitment	Establish a clear understanding of the Head Start Program Performance Standard and legal regulation by district leadership	Share notification of deficiency with all stakeholders (NHPS Administration and Department of Transportation, Head Start Policy Council, NHPS Board of Education)		3/27/2025
6	Ensure a shared commitment by the NHPS Board of Education, Executive Leadership Team, and First Student Bus Company Management Team	Conduct a root cause analysis and risk assessment	NHPS Executive Leadership Team NHPS Board of Education Head Start Policy Council, Head Start Director	4/7/2025
7	Consistent Messaging/Communication: revision and updates to existing bus policy and protocols regarding the release of Head Start Pre-k students and the establishment of clear routines/ steps to follow in the event an authorized adult is not presentat a designated stop, when release becomes questionable, or a bus stop location is in question		Head Start Assistant Director	4/11/2025
8		Establish a shared understanding of the Head Start Transportation Program Performance Standards and legal regulation by district and program leadership	NHPS Executive Leadership Team NHPS Board of Education Head Start Policy Council NHPS Director of Transportation	4/23/2025
9		Review existing district and Head Start program bus policies and protocols; align and ammend as needed	NHPS Executive Leadership Team NHPS Director of Transportation NHPS Board of Education Head Start Policy Council	4/14/2025
10		Meet with administration of First Student Bus Company to review their internal safety training, procedures and protocols (including evidence and documentation), handbook and align with program policies and HSPPS requirements as needed	NHPS Director of Transportation Head Start Director	4/25/2025
11		Examine record keeping and reporting	NHPS Director of Transportation Principal and Assistant Principal Dr. Reginald Mayo School	I 4/23/2025 04/28/25
12		Share outcomes from plan of quality improvement and risk management with all stakeholders (NHPS Administration and Department of Transportation, Policy Council, Board of Education)	Head Start Director	4/28/2025
13		Publish and communicate the changes in policies, procedures, and/or protocols	NHPS Director of Transportation Principal and Assistant Principal Dr. Reginald Mayo School Head Start Director	4/25/2025
14		Public meeting-Head Start Board of Education Subcommittee meeting to review of plan, and receive updates from Director of Transportation and planning for fall supervision	NHPS Director of Transportation Board of Education Members Head Start Director Early Childhood Director	5/15/2025
Accountability and Ownership	Clear, transparent, on-going communication with stakeholders	Clear, transparent, on-going communication with stakeholders	NHPS Director of Transportation Principal Dr. Reginald Mayo School Head Start Director First Student Bus Supervisors	on-going
16	Implementation of a New Haven Public Schools Head Start bus safety protocols and procedures	Implementation of a New Haven Public Schools Head Start bus safety protocols and procedures	NHPS Director of Transportation Principal Dr. Reginald Mayo School Head Start Director First Student Bus Supervisors	on-going
17		On-going two-way communication with transportation stakeholders	NHPS Director of Transportation Principal Dr. Reginald Mayo School Head Start Director First Student Bus Supervisors	on-going
Training, Aligned Support, and Monitoring		Develop and establish retraining and training time line/schedule for First Student Drivers and Monitors with District Director of Transportation and First Student Bus Supervisors	NHPS Director of Transportation Head Start Director First Student Bus Supervisor	April 2025 August 2025
19	Develop and establish retraining and training time line for First Student Drivers and Monitors with District Director of Transportation and First Student Bus Supervisors	Conduct transportation orientation on bus safety and parental/guardian responsibility	NHPS Director of Transportation Principal and Assistant Principal Dr. Reginald Mayo School	8/27/2025
20	Develop parent/guardian orientation on bus safety and parental responsibility	Review and/or develop Head Start teacher/staff protocols at the Dr. R.Mayo School	Principal and Assistant Principal Dr. Reginald Mayo School	8/27/2025
21		Develop a plan and system including timeline for shared on-going monitoring- calendar will be created for the 25-26 SY once staffing and bus routes/assignments are established	NHPS Director of Transportation Principal and Assistant Principal Dr. Reginald Mayo School First Student Supervisor Director of Head Start	on-going

A	В	С	D	E
	Develop a plan and system including timeline for shared on-going monitoring	Sharing and review of transportation safety and training logs	NHPS Director of Transportation Principal and Assistant Principal Dr. Reginald Mayo School First Student Bus Supervisors	on-going weekly (Mondays)
		Implementation of New Haven Public Schools Head Start bus safety protocols and procedures monitoring plan-calendar will be created for the 25-26 SY	NHPS Director of Transportation Head Start Designees First Student Bus Supervisors	Aug-25
	Implementation of a New Haven Public Schools Head Start bus safety protocols and procedures monitoring plan		·	





NATIONAL EMPLOYEE HANDBOOK

JULY 2022

www.firststudentinc.com

On behalf of First Student, welcome to our company!

At First Student, we believe every student deserves safe, reliable and friendly transportation to and from school. Our mission is to provide unmatched care and the safest ride to school, so when students arrive, they start and end their day with an exceptional experience and are ready to achieve their full potential.

As the leading school transportation provider in North America, First Student moves more passengers per day than all U.S. airlines combined. With a team of highly trained drivers and the industry's strongest safety record, First Student delivers reliable, quality transportation in all the communities we serve. We recognize that with every stop, we have the ability to positively impact each student's day, so they arrive at school ready to learn and be inspired.

Whatever your position in the company – driver, monitor, technician, supervisor or manager – you are an integral part of the First Student team and an important contributor to the overall success of our business. Our brand promise is Caring for Students is our FIRST priority. These words signify our commitment to serve as a trusted partner in a school district's mission and within the entire community.

At First Student, safety is a core value and a way of life for all of our employees. Safety has always been at the heart of everything we do. As a result, we're the only school transportation company to have received the prestigious National Safety Council (NSC) Green Cross for Safety* medal, the highest award for safety in North America.

As part of a company that places the utmost value on safety, each employee is accountable to help deliver safe, reliable service to our student passengers. The Employee Handbook that follows presents our policies and the guidance necessary for you to know and understand First Student's expectations of its employees in their day-to-day work life, and in their private life to the extent it may reflect or bear on the company's business interests. Each of us, together and individually, must endeavor to work toward these expectations to be a successful contributor to our team, and to support our Core Values.

You should carefully review the Handbook. Share any questions, ideas or suggestions you may have about the Handbook or other company policies or practices with your manager.

Thank you for being part of the First Student team!

John Kenning

CEO & President

Vision and Values

Mission

Provide unmatched care and the safest ride to school, so when students arrive, they start and end their day with an exceptional experience and are ready to achieve their full potential.

Values



Focus on Safety

Safety is at the heart of everything we do



Care for Our Students

Ensure our vehicles are welcoming and trusted places where students feel comfortable and secure



Surpass Customer Expectations

Go the extra mile to deliver an extraordinary experience for our customers and communities



Foster Teamwork

Work together, act with integrity, respect each other, champion diversity, and inclusion



Set the Highest Standards

Continually seek a better way to do things with innovation, sustainable practices, financial discipline, commercial excellence, and operational excellence

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Notices and Limitations

- The First Student Employee Handbook (Handbook) is not intended to be an employment contract
 or agreement, nor does it contain promises or commitments of any kind to employees. The
 contents should not be construed otherwise. Any references to, or discussion of, matters related to
 employment shall not be treated as a contractual agreement or guarantee of employment.
- This Handbook supersedes all previous Handbooks and any inconsistent verbal or written policy statements made or issued before this Handbook. The Company reserves the right to add to, modify, revoke, and/or interpret any of the policies or procedures in this Handbook at any time at its sole discretion without notice. Our failure to adhere to any provision of this Handbook does not create rights nor constitute a waiver.
- The employment relationship established with the Company is terminable at-will (except for employees covered by a Collective Bargaining Agreement), by either the employee or the Company, at any time, for any reason, with or without cause. The contents of this Handbook shall not be construed as creating a right to employment for any specific period of time. No manager or supervisor has any authority to enter into a contract of employment express or implied that changes or alters the at-will employment relationship. Only the CEO of the Companyand/or Senior Vice President of Human Resources & Labor Relations has the authority to enter into an employment agreement that alters the at-will employment relationship, and any such agreement must be in writing signed by the CEO of the Company and/or Senior Vice President of Human Resources & Labor Relations.
- This Handbook applies to employees represented by a labor union, only to the extent that the Handbook's provisions are not in conflict with a specific term or condition stated in the applicable Collective Bargaining Agreement (CBA). To the extent that the Handbook is in conflict with a term or condition of the employee's applicable CBA, the provision in the CBA shall take precedence.
- Where provisions in this Handbook are in conflict with applicable law, including state or local statutes, the state or local laws prevail, and the Company will comply with those laws.
- No person is authorized to make oral exceptions to this Handbook and written exceptions are permitted only when signed by the CEO of First Student.
- Nothing in this Handbook or in any other document or policy is intended to violate any local, state, or federal law. Nothing in this Handbook or in any other document or policy is intended to limit any concerted activities by employees relating to their wages, hours or working conditions, or any other conduct protected by Section 7 of the National Labor Relations Act. Nothing in this Handbook prohibits an employee from reporting concerns to, filing a charge or complaint with, making lawful disclosures to, providing documents or other information to, or participating in an investigation or hearing conducted by the Equal Employment Opportunity Commission ("EEOC"), National Labor Relations Board ("NLRB"), Securities and Exchange Commission ("SEC"), or any other federal, state or local agency charged with the enforcement of any laws.
- The purpose of the Handbook is to provide you information about First Student's employment
 practices and the expectations that we have concerning our employees. The Handbook is intended
 to serve as a reference tool for all employees and to provide guidance concerning many essential
 employment matters. Violation of any First Student policy and/or procedures puts your employment
 at risk.



A. Welcome to First Student

The First Student National Employee Handbook establishes standards for employment, operating efficiently, and delivering world class safety and customer service for First Student Inc. and its subsidiaries and affiliates (First Student). This is your personal copy. These First Student policies, practices and regulations should assist all employees in their day-to-day relationships with the public and the Company.

The purpose of the Handbook is to make First Student employees aware of the nature and scope of their responsibilities as a student transportation provider, thereby creating a better understanding and working relationship between drivers, attendants, managers, school officials, and student passengers. Each employee is responsible for learning and understanding the rules, consequences, and discipline outlined in this Handbook. This is a living document, and your input is sought and desired. Please feel free to bring any concern to management's attention.

Whenever an employee has been off duty for any reason, upon return it is the employee's responsibility to contact their manager, and review the bulletin board and/or First Connect app for any special instructions or changes. This will ensure the employee will be able to follow any new policy, practice or regulation that is in effect.

Your commitment to safety, efficiency, economy, and demonstration of a positive image are essential to maintain the highest quality standards of First Student. We are pleased that you have joined our team and invite you to share and help further our professional approach to student transportation.

Welcome to First Student!

B. Company Policies and the First Student Employee Handbook

This Handbook is designed to acquaint you with First Student and provide you with information about working conditions, policies, and procedures affecting your employment. You must read, understand, and comply with all provisions of the Handbook. It describes many of your responsibilities as an employee and outlines the Company's policies and procedures.

No employee handbook or policy can cover every circumstance or situation. As First Student continues to grow, the need may arise, and First Student may add to, modify, revoke, and interpret any of its policies, including any policy set forth in this Handbook at any time.

C. First Student Safety Policy

First Student will not perform any service, transport, or use a product, unless it can be done safely.

First Student requires all employees to perform their duties safely and with concern for the safety of our passengers, other employees, and the public. Management is committed to providing a safe workplace, the proper training, protective equipment, and a work environment conducive to safe practices and policies.

Management believes that working safely promotes quality, productivity, and profitability. Prevention of collisions and personal injuries is of critical importance to everyone. The Company is committed to on-going safety processes to help employees work safely at all times.

Safety protects our most important asset.... our people.

D. Drug and Alcohol Policy

First Student supports a policy of a drug-free workforce and does not tolerate any violation of our Drug & Alcohol Policy. The First Student Drug & Alcohol Policy (Policy) has been prepared, published, and distributed to all employees and contains the complete details of the First Student drug and alcohol programs, including federally required testing and compliance. The Policy, as mentioned briefly here, has been provided to each employee and is incorporated into the Employee Handbook by reference. A copy of the Policy is available at every Company location, and from any supervisor or manager in the Company.

The purpose of this Policy is to assure employee fitness for duty and to protect First Student employees, customers, and the public from the safety and health risks posed by the misuse of alcohol and the illegal use of drugs. Any violation of the Policy will result in disciplinary action, including, but not limited to, termination of employment for a first offense. Illegal use of drugs includes use of any illegal drug, misuse of legally prescribed drugs, and use of illegally obtained prescription drugs. The "use" of drugs means presence in an employee's body while on duty. A positive test is sufficient to support a finding of "use."

Please refer to First Student's Drug & Alcohol Policy in its entirety for a complete understanding of the program. If you or location management have additional questions about the Drug and Alcohol Policy, contact your Area Safety Manager or National Drug and Alcohol Program Administrator at 1-513-419-8736.

First BeSafe Principles

The First BeSafe Principles provide the basic truths or fundamental laws about working safely in our workplace and on our school buses. The First BeSafe Principles are designed to work with the BeSafe Program (BeSafe) explained below in the BeSafe section.

All First Student employees are expected to adopt these principles and put them into practice at all times, so together we may create a safe work environment free from injury to ourselves, our co-workers, and our passengers.

The motto for the First BeSafe Principles is:

Think Safe, Act Safe, BeSafe

This motto is your instruction to work safely at all times. If you feel you cannot perform a task safely, do not perform the task. Stop and immediately advise management of issues preventing you from working safely and what is required to ensure your safety.

Listed below are the BeSafe principles.

Prevent injury to myself and others.

Be aware of any hazardous condition or practice that may cause injury to people, damage to property, or the environment. Use your BeSafe Handbook to record and report.

Perform all necessary safety checks and risk assess my work area and job before I do any work.

Speak to your supervisor before you start work if you are unsure of required safety and risk assessments.

Follow all safety procedures, signs, and instructions.

If you do not understand, speak to your supervisor before you start work.

Keep my work area clean and tidy at all times.

Untidy areas could cause injury to you or to your colleagues and waste time and energy.

Wear my protective clothing and equipment as required.

Keep it in good working order, wear it correctly and ask for a replacement if it becomes damaged or unfit for your use.

Use only the correct tools and equipment that I am authorized and trained to use for the job.

Check that they are in good condition before use and use them safely.

Only adjust and repair any piece of work equipment if I am trained and authorized to do so.

Never modify any equipment that changes the designed use of the equipment or alters a safety feature.

Assess any load and my capability to move it before lifting.

Make sure you get help with any heavy or awkward items and follow the correct lifting techniques.

Report all injuries, incidents and near misses to my supervisor.

Seek help immediately and first aid (if necessary).

Tell my supervisor if I have any suggestions to prevent injuries in my workplace.

Make a note of your suggestions and discuss with your supervisor.

E. BeSafe

The main purpose of BeSafe is to reduce collisions and injuries by increasing the communications between employees and supervisors about safety. As part of the BeSafe process you are encouraged to initiate reports of any near miss, route and security hazards, or any unsafe condition. When you make a report to your supervisor about a safety or security concern, your supervisor will investigate the concern and follow-up with you regarding the resolution of the report. The Company will not retaliate against or impose any other form of retribution on any employee as a result of their good faith reporting of a safety issue and/or concern, another person's suspected violation of Company policies or guidelines, or any alleged violations of federal, state, or local laws.

Our supervisors initiate conversations with employees about their observations of both safe and unsafe behaviors. A quality discussion about safety benefits all parties and will lead to safer behaviors for our employees and passengers.

As part of BeSafe, each employee will be issued a BeSafe Handbook to carry with them at all times while they are on duty. The Handbook must be carried in either the clear plastic pouch with the safety lanyard and worn around the neck or inserted in the clear plastic pocket on the new style safety vests.

The BeSafe Handbook contains a "Safety Contact" pad which is for use by the employee for documenting and reporting safety, route, and security concerns. If an employee is involved in a near miss or a "close call" we are asking for their help in reporting the event so we all may learn the lessons from it and perhaps prevent a collision or injury from occurring.

When an employee observes an item on their route which in their opinion creates a safety or security hazard, we ask for their help in bringing it to their supervisor to discuss. If the safety or security hazard requires immediate attention, notify dispatch.



For over 50 years, First Student has provided safe solutions to transportation challenges. Today, First Student uses this experience to manage and maintain safe, reliable, and cost-effective student transportation systems. First Student provides student transportation services to localities throughout North America.

Every industry has one company that stands out as the leader in its field, a company that is acknowledged universally as "number one" in its business. In each case, there is a reason: corporate characteristics that distinguish a company and make it succeed.

For First Student, these characteristics are outlined in our Core Values: We are focused on safety, care for our students, surpass customer expectations, foster teamwork, and set the highest standards.

These are the attributes that make The First Student Difference.

A. Preferred Employer

First Student strives to be a "Preferred Employer." A Preferred Employer is an employer that attracts and retains quality employees. People choose to work for First Student, and stay with First Student, because of our commitment and efforts to have:

- · competitive wages and benefits
- safe and pleasant working environments
- safe and dependable equipment

A management team that:

- is committed to safety excellence
- treats employees with respect and dignity
- provides clear expectations and training
- treats employees fairly and consistently
- keeps an "open door," allows for offsetting issues right and holds "town hall meetings"
- encourages team spirit through involvement
- listens to employees' concerns, and researches and responds in a timely manner
- values all employees as professionals and business partners

IN SUMMARY: FIRST STUDENT CARES ABOUT YOU

B. First Student Principles

FIRST STUDENT WILL:

- Treat you as a professional and provide a climate of trust, respect, integrity, and honesty
- Ensure a safe working environment through a commitment to safety excellence, the development and implementation of safety processes, driver and attendant training, and safely maintained equipment and facilities
- Encourage two-way communication between you and management
- Communicate the standards of your job and the requirements of our customers
- Provide you with fair and competitive compensation based on performance
- Provide you with training to perform your job safely and effectively
- Recognize your need to maintain a balance of work, family, community, and personal activities
- Treat you as a valuable member of the First Student team

AS PROFESSIONALS, FIRST STUDENT EMPLOYEES WILL:

- Make safety their first and foremost priority in everything they do and remember to always adhere to "If you cannot do it safely, don't do it."
- Represent First Student in a professional, courteous, and respectful manner to the customer, the public, and the transportation industry at all times
- Maintain the highest regard for safety
- Provide our customers with consistent, high-quality service
- Meet or exceed job standards and customer requirements
- Maintain the highest standards of ethical and legal conduct, and to encourage others in the student transportation profession to do the same
- Properly care for all equipment
- Take an active role in communicating ideas, issues, and suggestions to management
- Be a valuable member of the First Student team

C. Diversity and Inclusion

First Student, as the leading provider of student transportation services in North America, is and has been committed to the goals and purposes of diversity and equal employment opportunities in the recruitment, employment, and advancement of minority and female personnel. Our commitment to equal employment opportunity for all races is also reflected in our own internal policy and structure with respect to hiring and promotions.

The mission of the D&I Committee is as follows:

- We aspire to have a culture where all people are first
- We strive to attract and develop a diverse workforce by promoting teamwork and embracing cultural differences
- We all play a role in advancing an inclusive environment where everyone is empowered to share their perspectives, listen, and respect others
- We will achieve this by our leadership fostering a people focused environment and engaging with our employees, customers, and communities
- In doing so, we will sustain an inclusive culture that supports future growth and fulfills our social responsibly

D. Our Commitment to an Open-Door Policy

When people work together in an organization, misunderstandings, mistakes, complaints about conditions, and questions about policies and practices sometimes give rise to employee dissatisfactions. Some may seem important to employees and some unimportant. In all cases, we would like to have the opportunity to seek out the fairest and equitable solution, but we can only do so if we are aware a situation exists. If you have concerns or complaints, please tell your manager or Area General Manager. You can discuss them professionally and frankly, without fear. We are ready to listen and will provide you with resources that may be able to assist you. It will help both you and us in the long run.

In the spirit of Fostering Teamwork, if you have ideas or suggestions that will improve operations or safety practices and that will make our location a better or safer place to work, please share them. Your ideas are welcome. They will be given consideration.

After raising your concerns with your manager, if you don't feel they are being addressed, contact your Region Human Resources Manager.

E. Town Hall Meetings

"Town Hall" meetings are an extension of First Student's Open-Door Policy. These meetings are designed to give employees a chance to meet, as a group, with their management team to discuss work related topics that affect more than one employee.

Employees wishing to discuss a problem, question, comment, or issue are encouraged to use the Open-Door Policy and meet with the Location Manager (or appropriate designee) one on one.

The purpose of either meeting is the same - as a Preferred Employer we want to listen to our employees about work related ideas and concerns.

Town Hall meetings are employee meetings. They may be initiated by either the employees or management. Attendance is voluntary and is non-paid. The meeting date and time will be posted. Employees may have the opportunity to provide topics for the agenda to their manager. They should be submitted in writing 24 hours in advance of the meeting. An agenda will be posted, and topics will be discussed in order. The meeting will last approximately one hour. Every employee is welcome to attend and participate even if they did not contribute to the agenda. Employees can stay as little as or as long as they wish.

The Location Manager's responsibility is to provide a time and place for such meetings, listen to the comments made, ask questions to clarify the issue or comment, and investigate the information gathered.

F. Employee Participation and Involvement

First Student values all employees as professionals and encourages them to participate in our safety process and selected operational processes.

Participation in the safety process is the key to creating a safe work environment free from injury and collisions. All employees are encouraged to be active participants in required safety meetings, by asking questions and actively listening. If you have a safety concern which warrants immediate attention, please report this to your manager without delay.

Employee involvement in operations could range from ideas shared one on one, in an Open-Door meeting / Town Hall meeting, suggestion box, and/or serving on an employee committee.

G. Career Pathing

Professional career growth within First Student is a top priority for us. We know that the ability to grow one's career internally is an important factor when candidates are selecting a company and when employees are choosing to stay with a company over time. Whenever possible, our goal is to grow talent from within the company, which includes lateral career moves (to gain more experience) as well as opportunities for promotion.

First Student is committed to hiring the best candidate for every position and providing equal opportunity employment for everyone, regardless of race, color, religion, gender, age, marital status, national origin, citizenship status, disability, genetic information, gender identity, or veteran status in all aspects of employment.

It is First Student's practice to post all open career opportunities below the Vice President level. The open position is posted on the First internal careers site: apply.internal.workatfirst.com, for a minimum of five business days. Concurrent with internal postings, open positions may be posted externally on the public career site at https://workatfirst.com.

Note: If a location is under a CBA that has different posting requirements, the Company follows those requirements.

Internal candidates with the required skills and experience for an open position must also meet the following requirements to be eligible to be considered:

- Approval from their current manager to apply for a specific open position
- Satisfactory or above performance rating in their current position
- As an employee's success is our priority, to ensure this, we prefer that the employee has been in their current position for at least one year before interviewing for a new position

Please direct your questions to the Talent Acquisition team at FirstStudentCareers@firstgroup.com.

We invite employees with access to the employee portal to visit the Talent Acquisition Portal Page.



A. Equal Opportunity Employer

First Student is an equal opportunity employer and is committed to providing a work environment that values diversity, inclusion, and promotes equal employment opportunity. First Student strongly believes in offering work-related opportunities based solely on qualifications and business necessity, without regard to race, color, religion, gender, sex, pregnancy (including lactation, childbirth, or related medical conditions), national origin, ancestry, age, marital status, physical or mental disability, military or veteran status, uniformed servicemember status, citizenship status, actual or perceived sexual orientation, gender identity, genetic information or carrier status, or any other consideration prohibited by applicable law.

First Student's commitment to providing equal employment opportunity applies to every applicant and employee. First Student prohibits unlawful discrimination by anyone, including managers, officers, coworkers and third parties doing business with or for First Student, such as customers or vendors. In alignment with our value of Setting the Highest Standards, all employees are expected to treat one another with the same professionalism as one would like to receive from others. This allows all employees to enjoy a work environment free of harassment, intimidation, and discrimination. In addition to hiring, all other terms and conditions of employment must be administered without unlawful discrimination, including without limitations, promotions, salary increases, benefits, and on-the-job training.

Any employee or applicant who believe that they have been subjected to or witnessed any kind of discrimination or who believes this policy has been violated or is not being properly implemented should follow the Complaint Procedure set forth in the Discrimination, Harassment and Retaliation Reporting Procedure.

If First Student determines an employee has engaged in conduct prohibited by this policy or other inappropriate conduct, even if it does not rise to the level of unlawful discrimination, will be subject to disciplinary action, up to and including termination of employment. Employees should note that they

may be held personally liable for any acts of unlawful discrimination. Retaliation for complaining about discrimination or for providing information related to a complaint, is strictly prohibited, and will not be tolerated, regardless of the outcome of the complaint. See the Company's Policy Against Retaliation.

B. Harassment Free Workplace

First Student is committed to providing a work environment free of prohibited harassment. Harassment because of race, color, religion, gender, sex, pregnancy, childbirth or related conditions, national origin, ancestry, age, marital status, physical or mental disability, military or veteran status, citizenship status, actual or perceived sexual orientation, gender identity, genetic information or carrier status, or any other consideration prohibited by applicable law is strictly prohibited and will not be tolerated.

First Student's anti-harassment policy applies to all persons involved in the operation of the Company and prohibits harassment, even if it does not rise to the level of being unlawful. This policy applies to all employees of the Company, including managers, officers, co-workers, and third parties doing business with or for First Student, such as customers and vendors. Harassment does not require the loss of some tangible economic benefit, but includes behavior that creates a hostile, intimidating or offensive work environment. The Company prohibits such conduct, even if the conduct is not sufficiently severe or pervasive to constitute unlawful harassment. If such harassment occurs in the workplace by someone not employed by the Company, the procedures in this policy should be followed.

For purposes of this policy, the workplace includes: actual worksites, any setting in which work-related business is being conducted (whether during or after normal business hours), company-sponsored events, or company owned/controlled property.

Any employee who is determined to have engaged in conduct prohibited by this policy or other inappropriate conduct, even if it does not rise to the level of prohibited harassment, will be subject to disciplinary action, up to and including termination of employment. Employees should note that they may be held personally liable for any acts of unlawful harassment.

Retaliation for complaining about discrimination or for providing information relating to such complaints is strictly prohibited and will not be tolerated, regardless of the outcome of the complaint. See the Company's Policy Against Retaliation.

As we are committed to providing a harassment free workplace, we provide training.

Sexual Harassment Defined

For purposes of this policy, sexual harassment is defined to include unwelcome sexual advances, requests for sexual favors, and other verbal, visual, or physical conduct of a sexual nature when:

- Submission to such conduct is either explicitly or implicitly made a term or condition of an individual's employment
- Submission to or rejection of such conduct is used as the basis for employment decisions affecting the individual

• Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creates an intimidating, hostile, or offensive working environment

Sexual harassment includes various forms of offensive behavior based on sex. The following is a non-exhaustive list of the type of conduct prohibited by this policy:

- Unwanted sexual advances or propositions (including repeated and unwelcome requests for dates)
- Offering employment benefits in exchange for sexual favors
- Making or threatening reprisals after a negative response to sexual advances
- Visual conduct: leering, staring, making obscene or sexual gestures, displaying sexually suggestive objects, pictures, cartoons, calendars, posters, websites, emails or text messages
- Verbal conduct: making or using sexually derogatory comments, innuendos, epithets, slurs, sexually
 explicit jokes, or comments about an individual's body or dress, whistling, making suggestive, or
 insulting sounds
- Verbal and/or written abuse of a sexual nature, graphic verbal and/or sexually degrading commentary about an individual's body or dress, sexually suggestive or obscene letters, notes, invitations, emails, text messages, tweets, or other social media postings
- Physical conduct: touching, assault, or impeding or blocking normal movements
- Retaliation for making reports or threatening to report sexual harassment

The above list of examples is not intended to be all-inclusive. Federal, state, and local governments protect against sexual harassment and provide for various remedies. There are additional applicable laws in a variety of jurisdictions.

Other Types of Unlawful Harassment Defined

Harassment on the basis of any legally protected status is prohibited, including harassment based on race, color, religion, gender, sex, pregnancy (including lactation, childbirth, or related medical conditions), national origin, ancestry, age, marital status, physical or mental disability, military or veteran status, uniformed servicemember status, citizenship status, actual or perceived sexual orientation, gender identity, genetic information or carrier status, or any other consideration prohibited by applicable law. Unlawful harassment in employment may take many different forms. Examples include, but are not limited to:

- Verbal conduct including taunting, jokes, threats, derogatory comments, vulgar, profane or threatening comments, slurs or epithets based on an individual's protected classification, including racial slurs and jokes
- **Visual conduct** such as statements or images in posters, cartoons, photos, drawings, calendars, websites, social media, emails, text messages, or publications that are harassing based upon any legally protected characteristic
- **Physical conduct** such as assault, blocking normal movement, restraint, touching or other physical interference with work directed at an individual because of an individual's protected status
- Threats and demands to submit to certain non-work-related conduct or perform certain non-work-related actions in order to keep or get a job, to avoid some other loss, or as a condition of job benefits, security, or promotion because of an individual's protected status

Preventing Harassment

Preventing harassment, including but not limited to, sexually offensive conduct, requires increased awareness by everyone of the impact their conduct might have on others. Employees should be sensitive to cultural differences that may exist in the workplace. What one employee thinks is proper conduct might be viewed as inappropriate by another. It is no excuse that the alleged offender "meant no harm" or "was just kidding."

Manager's Responsibility

All managers are responsible for:

- Implementing this policy, which includes, but is not limited to, taking steps to prevent harassment and retaliation
- Ensuring that all employees under their supervision have knowledge of and understand this policy
- Promptly reporting any complaints to the designated Human Resources Representative so they may be investigated and resolved in timely manner
- Taking and/or assisting in prompt and appropriate corrective action when necessary to ensure compliance with this policy
- Conducting themselves, at all times, in a manner consistent with this policy

Failure to meet these responsibilities may lead to disciplinary action, up to and including termination.

Any employee or applicant who believes that they have been subjected to or witnessed any kind of harassment or believes this policy has been violated should follow the reporting procedure set out in the Company's Reporting Procedure Policy.

Any employee who is determined to have engaged in conduct prohibited by this policy or other inappropriate conduct, will be subject to disciplinary action, up to and including termination.

Retaliation for complaining about discrimination or for providing information relating to such complaints, is strictly prohibited, and will not be tolerated, regardless of the outcome of the complaint. See the Company's Policy Against Retaliation set forth below.

C. Policy Against Retaliation

It is a policy of First Student to fully support any employee who reports actual or perceived discrimination, harassment, or unlawful conduct. Retaliation for complaining about discrimination, harassment, or retaliation, or for providing information relating to such complaints, is strictly prohibited, and will not be tolerated, regardless of the outcome of the complaint. In other words, employees are protected for speaking up in good faith if they believe discrimination, harassment, or retaliation has taken place, and from providing information related to such complaints, even if the complaint is ultimately not substantiated. Any supervisor, manager, or co-worker who retaliates against a complaining employee or anyone involved in an investigation of a complaint will be subject to discipline and/or termination of employment.

Some examples of what may constitute retaliation may include denial of promotion, refusal to hire, denial of job benefits, demotion, suspension, termination, negative evaluations, reprimands, and harassment. The above list of examples is not intended to be all-inclusive.

Any form of retaliation for speaking up about perceived bias, harassment or discrimination, or retaliation for providing information related to any investigation into such matters, is a separate violation of the Company's Harassment Free Workplace Policy and the Company strictly prohibits such conduct. Such conduct may also be unlawful. If you believe that you have been subjected to retaliation by a co-worker, supervisor, or manager, or believe another individual has been subject to retaliation, you should promptly report the matter using the Company's Discrimination, Harassment, and Retaliation Reporting Procedure set forth immediately below.

D. Discrimination, Harassment, and Retaliation Reporting Procedure

Company's Complaint Procedures

Any employee who believes that they have been subjected to or witnessed any kind of discrimination, harassment, retaliation, coercion, or intimidation by anyone, whether by an officer, co-employee, a customer or vendor, or a member of our management, is encouraged to immediately file a written or verbal complaint with their Location Manager. However, employees may also directly file a written or verbal complaint with Region Human Resources by calling the confidential Ethics and Compliance Toll-free Hotline at 1-877-322-5534 or contacting the Hotline intake site at ethicsfirst.ethicspoint.com.

Employees are not required to file a complaint with the Location Manager with whom the employee is uncomfortable discussing such matters in order to pursue other reporting mechanisms. Employees will not be retaliated against for submitting a good faith report under this policy or for cooperating in an investigation. Employees are encouraged, but not required, to communicate to the offending person that their conduct is offensive and unwelcome. Any Location Manager who receives either a verbal or written, formal, or informal complaint must **immediately** notify the Human Resources Department after receiving the complaint.

All complaints will be thoroughly and objectively investigated. The investigation may include interviews of individuals believed to have information regarding the alleged conduct. Such complaints or investigations will remain confidential to the extent possible and permitted by law, but confidentiality cannot be guaranteed. For instance, the Company may need to disclose certain information to investigate a matter and disclose corrective measures taken.

If the investigation reveals that a violation of the Company's non-discrimination, Harassment Free Workplace Policy or anti-retaliation policy, or other inappropriate conduct has occurred, then the Company will take immediate corrective action, including discipline up to and including termination of employment, as appropriate under the circumstances, and regardless of the job position of the parties involved.

The Company may discipline an employee for any inappropriate conduct discovered in the investigation regardless of whether the conduct amounts to a violation of law. If the person who engaged in the harassment, discrimination, or retaliation is not employed by the Company, then the Company will take

whatever corrective action is reasonable and appropriate under the circumstances. Appropriate action may also be taken to deter any future discrimination, harassment, or retaliation prohibited by this policy.

If a complaint cannot be substantiated, the Company may take appropriate action to reinforce its commitment to providing a work environment free from harassment.

If a violation of the Company's Equal Employment Opportunity or Discrimination, Harassment or Retaliation Policies are found, measures will be undertaken to protect those who use the Complaint Procedure from any further acts of discrimination, harassment, coercion, or intimidation, and from retaliation due to reporting an incident of this type or participating in an investigation or proceeding concerning the alleged conduct.

It is the obligation of all employees to cooperate fully in the investigation process. In addition, disciplinary action may be taken against any employee(s) who attempt to discourage or prevent any employee from using the Company's Complaint Procedure to report misconduct or who provide knowingly false information during the course of an investigation.

The initiation of a good faith complaint of harassment or retaliation will not be grounds for disciplinary action, even if the allegations cannot be substantiated. Any individual who makes a complaint that is demonstrated to be intentionally false may be subject to discipline, up to and including termination of employment.

Complaints may be made anonymously by:

- Calling the Ethics and Compliance Toll-free Hotline at 1-877-322-5534
- Visiting the Hotline intake site at ethicsfirst.ethicspoint.com
- Emailing Compliance@firstgroup.com

E. Introductory Period

An Introductory Period of 90 calendar days, starting after any period of Company-required training, shall constitute a trial period for all new hires. During this time the Company will judge the ability, competency, fitness, and other qualifications of new employees to do the work for which they were employed. The Company reserves the sole right to determine the suitability for continued employment of an individual within these 90 calendar days for any reason not protected by law. During this time, you have the opportunity to evaluate the Company as a place to work, and the Company has the opportunity to evaluate you as an employee. The Company reserves the right to extend the Introductory Period. Successful completion of the Introductory Period does not alter the at-will nature of employment for non-unionized employees and does not preclude the Company from further evaluating your work performance throughout your time with First Student. Unionized employees should refer to their Collective Bargaining Agreement.

F. No Solicitation / Distribution of Literature

Solicitation for any purpose is not permitted while the employee is on working time, or the employee being solicited is on working time. Non-employees are not permitted to solicit for any purpose on Company property.

As used in this policy, "working time" includes all time for which an employee is paid and/or is scheduled to be performing services for the Company. Working time does not include free time, whether paid or unpaid, such as breaks, lunch periods, or before and after scheduled work hours.

Employees may not distribute literature or other printed material at any time in Company work areas or during paid working time, nor may any person not employed by the Company distribute literature on Company property. Employees are permitted to distribute literature and other printed material during non-working times in non-work areas.

Employees who violate this policy will be subject to disciplinary action, up to and including termination of employment.

G. Parking

First Student shall not be liable for any damage to personal vehicles at the workplace that may be caused by another party. All employees must reverse park buses and personal vehicles, if required by the location.

H. Personal Safety

We care about you and your personal safety and will do everything possible to provide you with a safe work environment. If you are injured in the course of your work, you should report immediately to your supervisor for first aid treatment. Report the injury no later than 24 hours, no matter how slight the injury. If your injury is of a serious nature and requires further attention, you will be taken to the nearest qualified treatment center. Our claims administrator can only make payment after acceptance and approval of your claim.

Every employee will have personal protective equipment (PPE) and safe work methods required for certain tasks in their job. It is the responsibility of the employee to use that equipment and follow the safe work methods as instructed. Failure to do so may lead to injury for the employee and/or others. It is a violation of Company policy to not use the required equipment provided for certain tasks.

Any employee, vendor, and visitor on Company property shall wear the Company-issued "reflective safety vest" or high-visibility clothing when walking on Company property outside of our buildings. Where designated pedestrian walkways are marked, they should be utilized at all times when walking in our bus yards. Only Authorized Employees are allowed in a First Student maintenance shop. When required to enter, all other employees and persons will remain behind the yellow lines in the safe area and will leave immediately when asked by a shop employee, supervisor, or manager.

WORKING SAFELY IS A BEHAVIOR, not a thought. Each employee is responsible for their own safety and that of others around them. No employee is exempt from the Company's BeSafe Principles and safe work rules. As an employee of First Student, you are expected to tell others when you see them not using protective equipment and/or not following a safe work method, or if not comfortable doing so, then to your supervisor. A safe workplace requires ALL employees' cooperation and acceptance of responsibility.

RIGHT-TO-KNOW: EMPLOYEES

The Occupational Safety and Health Administration (OSHA) requires that all employers advise their employees, through written communications and formal training, of:

- Potentially hazardous materials within the work site
- Precautionary measures which must be taken to avoid a chemical release into the environment and employee exposure to that release in the event it occurs
- Proper, safe methods of spill control and clean up

Each employee has a right to know...

- Of any operations in their work area where toxic or hazardous chemicals are present
- These details about hazardous materials in their work area:
 - o which one(s) they may handle
 - o where to find information about the materials
 - o how to safely handle those materials
 - o how to react in case of an uncontrolled release of those materials
- How to protect yourself from hazardous materials in all situations within the location

Your location must...

- Have a written hazard communications program that describes how the HCP will be implemented
- Conduct training of all employees so they will know about hazardous materials in their work areas
- Ensure that all hazardous material containers, both primary {manufactured} and secondary {miscellaneous buckets/containers}, are properly labeled
- Ensure Safety Data Sheets are available to employees

Each new employee must receive initial training prior to having any access to the area in which hazardous materials are utilized.

I. No Smoking Policy

First Student is a smoke-free workplace. "Smoking" includes the use of traditional tobacco products, smokeless tobacco, and the use of electronic nicotine delivery systems or electronic smoking devices.

Smoking is not permitted in any First Student facility or on any First Student vehicle. This includes but is not limited to the office, employee lounge, restrooms, hallways, and shop area. Those employees who wish to smoke must do so outside the building in the designated area. Additionally, smoking is not permitted on school property.

There is NO smoking within 50 feet of the fuel island. This policy applies to all employees, visitors, vendors, and staff.

Violation of this policy may subject an employee to discipline, up to and including termination of employment.

J. Transitional Duty

First Student maintains a commitment that employees injured on the job receive prompt quality medical care and return to work in a productive transitional duty capacity as quickly as they are medically able to do so.

Should you sustain an injury while on the job, you must take the following steps:

- Report the incident to your supervisor immediately
- Complete a written report of the incident
- Follow the medical provider's instructions
- Keep all future medical appointments
- Bring the Work Status form to all medical appointments
- Participate in discussions regarding:
 - o your current condition, medical treatment, special problems, or concerns
 - o your possible return to work in your regular job or a transitional job
- Return to a regular or temporary transitional duty position when available and the doctor permits

Transitional duty is a temporary process that allows employees to remain productive in the workforce while they regain their full capacity during the recovery/rehabilitation process. There are two types of transitional duties that allow for this process:

- 1. Limited duty allows for an employee to work in their original job with some limitation.
- 2. **Modified work** allows for an employee to work a position other than their normal position.

This Return-to-Work policy requires employees to:

- Return to work once they are medically able to do so, by a physician, to a job they are capable of performing
- Participate in this process to the best of their ability as a condition of employment
- Sign an Employee Responsibility Form which indicates that the employee has received and understands this process

Employees that choose to not participate in this process may subject themselves to disciplinary action, up to and including termination of employment, as well as running the risk of losing Worker's Compensation benefits.

K. Religious Accommodation

The Company will provide reasonable accommodation for employees' religious beliefs, observances, dress attire, and practices when a need for such accommodation is identified, and reasonable accommodation is

possible. A reasonable accommodation is one that eliminates the conflict between an employee's religious beliefs, observances, or practices and the employee's job requirements, without causing undue hardship to the Company.

The Company has developed an accommodation process to assist employees, management, and Region Human Resources. Through this process, the Company establishes a system of open communication between employees and the Company to discuss conflicts between religion and work and to take action to provide reasonable accommodation for employees' needs. The intent of this process is to ensure a consistent approach when addressing religious accommodation requests. Any employee who perceives a conflict between job requirements and religious belief, observance, or practice should bring the conflict and their request for accommodation to the attention of Region Human Resources to initiate the accommodation process. The Company requests that accommodation requests be made in writing, and in the case of schedule adjustments, as far in advance as possible.



A. Payroll Policy Statement & Procedure

A schedule will be developed for each hourly employee. The immediate supervisor and employee will be involved in the development and maintenance of an accurate schedule. Employees are encouraged to work with their immediate supervisor if their schedule needs to be modified.

B. Payroll Integrity Policy

This policy applies to all hourly paid employees of First Student.

First Student is committed to paying all employees correctly and to maintaining accurate payroll records. To ensure you are paid correctly, you must timely and accurately report and record all hours you work and all the accrued/earned benefit hours that you use.

Work means any activity that you are required, requested, or permitted to perform in the interest of the Company or for the Company's benefit.

Accrued benefit hours means paid time-off hours that you earn, such as vacation, personal time, bereavement time, and disability, if applicable.

Timely means by the end of the next scheduled shift.

Reporting and Recording Work Hours and Benefit Hours

You must accurately report and record all hours you work for the date you performed the work including meal periods where appropriate. Using current payroll procedures, the Company will pay hourly employees for

all hours worked and will pay used, accrued benefit hours used on the date such hours were approved to be used, in accordance with Company Policy.

It is a violation of the Company's policy for anyone to instruct or encourage another employee to work "off the clock," to incorrectly report hours worked, or to alter another employee's time records. If any employee is directed or encouraged to incorrectly report hours worked, or to alter another employee's time records, they should report the incident immediately to Human Resources.

Editing Time Records

Time records may only be edited to correct a mistake, such as when an employee advises they mistakenly listed an incorrect start or stop time. Only those authorized may edit time records. Those authorized to edit time records may not edit time for another employee without prior approval.

If you are authorized to edit time records, you may not edit your own time. A First Student member of management must authorize edits to your time records when editing is required. If a member of management is unavailable another person with time editing responsibility must authorize edits to your time.

Falsification of Payroll Records Prohibited

First Student prohibits falsification of any payroll record, which includes, but is not limited to intentionally or knowingly:

- Clocking in or clocking out for another employee
- Failing to report and record all work hours or all earned benefit hours used
- Reporting and/or recording false information regarding work hours or earned benefits hours
- Failing to correct false information regarding work hours or earned benefit hours, which includes repeatedly failing to correct any errors
- Instructing any employee to falsify any payroll record
- Misusing paid time or using paid time without authorization (e.g., using paid time and claiming pay for leisure and other non-work activities)

If it is determined that an employee violated this policy, disciplinary action, up to and including termination of employment may be issued.

Investigations and Appropriate Action

First Student will take any reported possible deviations from this policy seriously. The Company will investigate promptly and thoroughly any report of a possible deviation from this policy. If the Company determines that a deviation from this policy has occurred, it will take appropriate action, including compensating any employee for improperly edited work hours or earned benefit hours, to correct the issue and prevent further errors.

C. Employee Classification

Employees are classified as either exempt or nonexempt under federal and state wage and hour laws. Exempt employees (which we refer to internally as salaried employees) are employees whose job assignments meet specific tests established by the federal Fair Labor Standards Act (FLSA) and state law and who are exempt from minimum wage and overtime pay requirements. Exempt employees are compensated on a salary basis. Nonexempt employees (which we refer to internally as hourly employees) are employees whose job positions do not meet FLSA or applicable state exemption tests, and who are NOT exempt from minimum wage and overtime pay requirements. Nonexempt employees are eligible to receive overtime pay for hours worked in excess of 40 hours in a given week, or as otherwise required by applicable state law.

D. Overtime

When operating requirements or other needs cannot be met during regular working hours, employees may be scheduled to work overtime. Nonexempt employees will be paid overtime where required by and in accordance with applicable law. Paid time off such as sick pay, holiday pay, vacation pay, and jury duty pay (where applicable) will not count toward hours worked for the purpose of determining overtime pay.

All overtime work must be authorized in advance by the employee's supervisor. Working overtime without prior authorization may result in disciplinary action.

E. Charter and Field Trips

All driving and attendant positions with First Student are part-time/seasonal during the regular school year and summer school session. Optional summer route work is assigned as such work becomes available. All employees must participate in summer work when requested by local management.

It is the desire of First Student to distribute the field trip and charter work as fairly as possible among drivers who desire this additional work. It is the policy of First Student to offer this work on a rotating basis. First Student must provide its customers with the level of performance and satisfaction the customers require. Therefore, overtime and equitable distribution of work will be considered in assigning trips. Among the factors to be considered are:

- Seniority based on hire date or CBA regulations
- Customer preference when agreed upon by management and customer/client
- Coordination with existing runs
- Equitable distribution of work among employees
- Not exceeding a 40-hour workweek unless no other option is available
- Able to perform trip without exceeding the Hours-of-Service Regulations as described in
- the Federal Motor Carrier Safety Regulations Handbook

To the extent an applicable CBA has different provisions, the Company complies with the CBA.

Management will maintain a list of all drivers in order of employment dates with the Company. Any driver who does not wish to work extra hours should request their name be taken off the charter/extracurricular list.

Employees are not to accept cash payments for conducting charters. Any employees who may be offered a cash payment must refuse the offer and immediately bring it to the Location Manager's attention.

F. Meal and Rest Breaks

It is the Company's policy to comply with all laws regarding meal and rest breaks. If an employee works in a state where there are no applicable meal or rest break requirements, the Company will provide break time as appropriate, subject to operational needs and supervisor discretion. Meal and rest breaks in these locations are not guaranteed.

G. Lactation Accommodation

The Company will provide a reasonable amount of break time to accommodate an employee desiring to express breast milk for the employee's infant child. Employees needing breaks for lactation purposes may use ordinary paid rest breaks or may take other reasonable break time when needed. If possible, the lactation break time should run concurrently with scheduled meal and rest breaks already provided to the employee. If the lactation break time cannot run concurrently with meal and rest breaks already provided or additional time is needed for the employee, the lactation break time will be unpaid for hourly employees.

Employees should contact their Location Manager and/or their Region Human Resources Representative during their pregnancy or before their return to work to identify the need for lactation accommodations. The Company will comply with applicable federal, state, and local laws regarding lactation accommodations.

Refer to the Lactation Accommodation Policy for all policy details, guidelines, and employee/manager responsibilities.

H. Garnishment Fees

Whenever the Company is required to garnish an employee's wages, an administrative fee will be charged to the employee per garnishment where permitted by law. These fees are regulated by the state and subject to change at the discretion of the state.

I. Payday

You will be informed of the regular schedule for the issuance of pay statements, pay card funding, or direct deposit. The pay statement will generally cover compensation earned for the previous work period. Please note that in some locations, pay frequency and date may be determined by an applicable CBA.

J. Deductions

Your pay statement is subject to various deductions. The pay statement will show you exactly what deductions have been taken from your pay. You will want to keep this as a permanent record. Certain deductions are required by law. These include, for example:

- Federal Income Tax
- Social Security Tax
- Medicare Tax
- State Income Tax (where applicable)
- Local or county taxes

Other deductions are optional and will be taken only if you have signed a written or electronic authorization for the deduction (i.e., credit union, medical insurance, uniforms, etc.).

In the following circumstances an exempt employee will not receive pay for days not worked:

- When an exempt employee works only part of the week during their first and last week with the Company, the employee will be paid only for the days actually worked
- When an exempt employee takes unpaid leave under the Family and Medical Leave Act (FMLA) or corresponding laws, the Company will not pay for such days/hours of absence
- When an exempt employee receives an unpaid disciplinary suspension of one or more full days, imposed in good faith for workplace conduct rule infraction, the Company will not pay for such days of suspension

The Company may require an exempt employee to use available vacation or sick time, as a replacement for salary, when the employee takes less than a full day off from work.

An exempt employee's salary will not be reduced when the employee works part of a week and misses part of a week due to service as a juror, witness, in the military, or lack of work, though deductions may be made to offset amounts an employee receives as jury or witness fees, or for military pay.

It is company policy to comply with the salary basis requirements of the Fair Labor Standards Act (FLSA) and applicable state law. The Company prohibits any deductions from pay that violate the FLSA or applicable state law.

Employees can be paid with a "live check," but are encouraged to sign up for direct deposit or a Pay Card, which will be automatically deposited. To access your pay information, you can use one of the following two methods: ADP iPay or ADP Employee Self Service. All current and former employees of the Company have access to both sites.

The ADP iPay Website (ipay.adp.com), available through a browser or the ADP Mobile Solutions App) provides "view access" to your pay statement. ADP Self Service (accessible with a browser only offers this same pay information but with additional features, including: the ability to update personal information, tax

withholding, direct deposit information, tools to assist employees, and answers for pay-related questions. To access:

- Log on to http://bit.ly/1stgrp
- First time users: Click "Register Now"
 - Enter the registration code: 1stgrp-ipay
 - Register your personal information including full name, social security number (no dashes) and birth date
- Returning users: Enter your @1stGrp username and password to sign in.

Any error or overpayment made in your pay statement should be reported immediately to your supervisor.

You will be required to present your driver's license when receiving your pay statement. If you are unable to produce your driver's license, you will receive your pay statement but will not be able to drive again until you have produced a current license.

K. Reporting Errors

If you believe that your work hours or accrued benefit hours have not been accurately reported or recorded, or if you are aware of any other potential deviation from this policy, or if you have any questions or concerns about your pay or any deductions taken, you should immediately contact your manager, or if necessary, the confidential Ethics and Compliance Hotline at 1-877-322-5534, or contact the Hotline intake site at ethicsfirst.ethicspoint.com.

If you believe that your managermay be violating this policy, you are not required to report the violation to that person. You may report the possible violation to any First Student member of management, or you may call the Ethics and Compliance Hotline or Human Resources.

Every report will be fully investigated, and the Company will provide the employee with any compensation to which the employee is entitled in a timely fashion. The Company complies with all applicable laws, including the Fair Labor Standards Act, and will not allow any form of retaliation against individuals who make good faith reports of alleged violations of this policy, or who cooperate in an investigation by the Company, even if the reports do not reveal any errors or wrongdoing.

L. Change of Personal Status

It is critical that all changes of personal status, regardless of if it was updated on ADP Employee Self Service, be reported immediately in writing without delay to the Location Manager. (Examples: name, address, phone number, emergency contact, tax information, copy of license renewal) It will be your responsibility to notify the office to make sure the change is updated with your location records. Certain Company correspondence will be mailed to your home address. It may also be important to contact you by phone for charter trips, or to contact you or your family quickly in case of illness, accident, or emergency.



A. Leave of Absence (LOA)

Employees may require an extended period away from work due to illness, a need to care for a family member, military duty, or personal reasons. This section describes some of the most common types of Leave of Absence (LOA).

Generally, LOA is defined as an absence from work that exceeds 3 working days, other than a scheduled, preapproved vacation/PTO period. LOA may also be granted when there is an on-going need for intermittent periods of time off work. With the exception of Personal LOA (see below for details), following process should be followed:

- 1. Employee should inform their Location Manager of the need for LOA
- 2. Contact the third-party leave administrator found at the back of this booklet, to identify applicable leave types and initiate the application process. In some instances, your manager or Human Resources Representative may initiate this process for you
- 3. Carefully review all documents sent by the thirdy-party administrator. Complete and return certification forms by the deadline listed in your application packet
- 4. When received, discuss your leave approval with your manager

If your leave request is denied, contact the third-party administrator to confirm that your leave application and certification forms were received and fully completed.

IMPORTANT: Until your leave request is approved, you will need to follow normal call-out procedures wherever possible. Requesting an LOA through the leave administrator does not substitute timely, appropriate communication with your manager.

Note that in an emergency situation where advanced notification is not possible, normal leave procedures may be modified or accelerated.

Returning to Work

You will receive all applicable return to work forms and information in your initial leave application packet. Please note that you must send your return-to-work release to the leave administrator before returning to the workplace. Contact your manager to confirm your return date and discuss your schedule. Return-to-work guidelines may include a fitness for duty examination or other testing according to Company Policy or as required by law.

Modified Duty

If your return to work requires modified duty or other accommodations, the Workplace Accommodations Policy, outlined in this handbook, will be followed.

B. Family and Medical Leave Act (FMLA)

The Company will grant family and medical leave in accordance with the requirements of applicable federal, state, and local laws in effect at the time the leave is granted. Employees will be eligible for the most generous benefits available under applicable law. To the extent required by law, some extensions to leave beyond an employee's FMLA entitlement may be granted when the leave is necessitated by an employee's work-related injury or illness or by a "disability" as defined under the Americans with Disabilities Act and/or applicable state or local law. Certain restrictions on these benefits may apply.

Basic Eligibility Requirements

Employees are eligible if they have worked for a covered employer for at least one year, for 1,250 hours over the previous 12 months, and if at least 50 employees are employed by the Company within a 75 mile radius.

FMLA does not affect any federal or state law prohibiting discrimination or supersede any state or local law or Collective Bargaining Agreement which provides greater family or medical leave rights.

Special Note Regarding Collectively Bargained Employees

Some collectively bargained employees are eligible for "FMLA-like" medical leave with varying hours worked eligibility requirements. For personalized eligibility information, please contact our third-party leave of absence administrator.

Family Medical Act Leave Entitlement

FMLA requires covered employers to provide up to 12 weeks of unpaid, job-protected leave per rolling 12-month period to eligible employees for the following reasons:

- For incapacity due to pregnancy, prenatal medical care, or childbirth
- To care for the employee's child after birth, or placement for adoption or foster care (bonding leave)
- To care for the employee's spouse, child, or for a child where the employee stands in loco parentis, or parent or a person who stood in loco parentis to the employee, who has a serious health condition
- For a serious health condition that makes the employee unable to perform the employee's job
- For military family leave (described below)

First Student uses a "rolling" 12-month period measured backward from the date an employee first uses any FMLA leave. With this method, our leave administrator will count or "look backwards" for 12 months from any

given leave request date and total the amount of FMLA used (if any), subtracted from the 12-week maximum. That balance is the amount of FMLA leave currently available for use.

Military Family Leave Entitlements

Eligible employees with a spouse, son, daughter, or parent on a Covered Active Duty (as defined by FMLA) or are called to Active-Duty status in the National Guard or Reserves in support of a contingency operation in a foreign country may use their 12-week leave entitlement to address certain qualifying exigencies.

Qualifying exigencies may include attending certain military events, arranging for alternative childcare, addressing certain financial and legal arrangements, attending certain counseling sessions, and attending post-deployment reintegration briefings.

Covered Service Member Caregiver Leave Entitlements

FMLA also includes a special leave entitlement that permits eligible employees to take up to 26 weeks of leave to care for a covered service member during a single 12-month period. A covered service member is a current member of the Armed Forces, including a member of the National Guard or Reserves, who has a serious injury or illness incurred or aggravated in the line of duty on Active Duty that may render the service member medically unfit to perform his or her duties for which the service member is undergoing medical treatment, recuperation, or therapy; or is in outpatient status; or is on the temporary disability retired list.

A "single 12-month period" begins on the date of the employee's first use of such leave and ends 12 months after that date. If both spouses work for the Company and are eligible for covered service member caregiver leave, the spouses will be limited to a total of 26 workweeks off between the two when the leave is for covered service member caregiver leave, military family leave, bonding leave and/or leave to care for a parent with a serious health condition.

Benefits and Protections

During FMLA, the Company maintains the employee's health coverage under any "group health plan" on the same terms as if the employee had continued to work. This means that if employees want their benefits coverage to continue during their leave, they must also continue to make the same premium payments that they are now required to make for themselves or their dependents. In some instances, the Company may recover premiums it paid on the employee's behalf to maintain health coverage if the employee fails to return to work following FMLA.

Under most circumstances, employees will be reinstated to the same position they held at the time of the leave or to an equivalent position with equivalent pay, benefits, and other terms and conditions of employment. However, employees have no greater right to reinstatement than if they had been continuously employed rather than on leave. For example, if an employee would have been laid off if he or she had not gone on leave or, if the employee's position was eliminated during the leave, then the employee will not be entitled to reinstatement. Key employees may be subject to reinstatement limitations in some circumstances. If employees are considered a "key employee," those employees will be notified of the possible limitations on reinstatement at the time the employee requests a leave of absence.

Use of FMLA cannot result in the loss of any employment benefit that accrued prior to the start of an employee's leave. The employee's length of service at time of the leave will remain intact, but accrued benefits such as vacation and sick leave may not accrue while on an unpaid FMLA.

Use of Leave

Family Medical Leave can be taken intermittently or on a reduced leave schedule when medically necessary. Employees must make reasonable efforts to schedule leave for planned medical treatment so as not to unduly disrupt the employer's operations. If FMLA is taken intermittently or on a reduced schedule basis due to foreseeable planned medical treatment, we may require employees to transfer temporarily to an available alternative position with an equivalent pay rate and benefits, including a part-time position, to better accommodate recurring periods of leave. Leave due to qualifying exigencies may also be taken on an intermittent basis.

An employee's leave of absence may be covered by more than one leave policy and more than one applicable federal, state, or local law. If so, the employee's leave time under each policy and applicable law will run concurrently (at the same time).

If an employee's request for intermittent leave is approved, the Company or its third-party administrator may later require employees to obtain recertification of their need for leave. For example, the Company may request recertification if it receives information that casts doubt on an employee's report that an absence qualifies for FMLA.

Employees on a leave of absence may not use this period off work to: engage in other employment, execute a probationary period with another employer, or train for a job outside of First Student, except in reference to Military Leave, approved pre-approved volunteer work, or otherwise as required by law.

Substitution of Paid Leave for Unpaid Leave

Generally, FMLA Leave is unpaid. However, employees may be eligible to receive benefits through state-sponsored programs or the Company's sponsored wage-replacement benefit programs. Employees may choose or employers may require use of accrued paid leave while taking FMLA leave. All payments of wage-replacement benefits and accrued paid leave will be integrated so that employees will receive no greater compensation than their regular compensation during this period. The use of paid benefits will not extend the length of the approved FMLA. First Student's disability vendors may share leave duration other approval information with the leave of absence administrator for purposes of coordinating your leave entitlement.

In order to voluntarily elect to use paid leave for FMLA, employees must comply with the Company's paid leave policies.

Employee responsibilities

Employees must provide 30 days' advance notice of the need to take FMLA when the need is foreseeable. When 30 days' notice is not possible, the employee must provide notice as soon as practicable and generally must comply with the Company's normal call-in procedures.

Employees must provide sufficient information to the Company or its third-party administrator to determine if the leave may qualify for FMLA protection and the anticipated timing and duration of the leave.

Sufficient information may include that the employee is unable to perform job functions, the family member is unable to perform daily activities, the need for hospitalization or continuing treatment by a health care provider, or circumstances supporting the need for military family leave. Employees also must inform

the Company or its third-party administrator if the requested leave is for a reason for which FMLA leave was previously taken or certified. Employees also may be required to provide a certification and periodic recertification supporting the need for leave. Employees must notify the leave administrator as soon as possible if it becomes apparent that the employee can resume work earlier than anticipated. Employees must also notify the leave administrator and provide supporting documentation if they cannot return to work on their scheduled return date.

In certain circumstances where required by law, employees in certain roles may be required to demonstrate their fitness for duty following a leave of absence. If this applies to your specific leave, you will be notified by the leave administrator in the return to work documents you receive in the mail.

Absent unusual circumstances, failure to comply with notice and certification requirements may result in a delay or denial of the leave. If an employee fails to return to work at leave's expiration and has not obtained an extension of the leave, the Company may presume that the employee does not plan to return to work and has voluntarily terminated their employment.

An employee who fraudulently obtains Family and Medical Leave from the Company is not protected by FMLA's job restoration or maintenance of health benefits provisions. In addition, the Company will take all available appropriate disciplinary action against such employee due to such fraud.

Non-Discrimination

The Company takes its FMLA obligations very seriously and will not interfere, restrain, or deny the exercise of any rights provided by the FMLA. We will not terminate or discriminate against any individual for opposing any practice, or because of involvement in any proceeding related to the FMLA. If an employee believes that their FMLA rights have been violated in any way, they should immediately report the matter to Human Resources.

Employees may appeal the denial of their leave of absence application. Such appeal should be submitted in writing to LOA@Firstgroup.com.

Additional Information

To obtain forms to request FMLA or for more information about FMLA or other state laws regarding Leave of Absence, refer to the information posted on your location's bulletin board, ask your Location Manager, or contact your Region Human Resources Representative.

A Notice to Employees of Rights Under FMLA (WHD Publication 1420) is attached to this Handbook.

C. Military Leave

First Student recognizes that employees who are members of the military may need to attend annual training or to report for Active Duty. The Company provides unpaid military leaves of absence to employees who serve in the uniformed services as required by USERRA and applicable state laws.

Service consists of performing any of the following on a voluntary or involuntary basis: active duty, active duty for training, initial active duty, inactive duty training, full-time National Guard duty, State active duty for a period of 14 days or more, State active duty in response to a national emergency declared by the President

under the National Emergencies Act or in support of a major disaster declared by the President under Section 401 of the Stafford Act, absence from work for an examination to determine fitness for such duty, and absence for performing funeral honors duty.

For purposes of this policy "State active duty" means training or other duty, other than inactive duty, performed by a member of the National Guard of a State, under the authority of the Governor of a State. It does not include duty performed under federal authority (such as Title 10 or Title 32), nor duty for which the National Guard member is entitled to pay from the Federal Government.

A "State" includes the several states of the United States, the District of Columbia, Puerto Rico, Guam, the Virgin Islands, and other U.S. Territories.

Total military leave time may not exceed 5 years during employment, except in certain, defined circumstances.

Employees who are members of the military reserves or the National Guard may attend annual training sessions, with a maximum of two weeks of paid leave allowed during a 12-month period.

Health Insurance for military service for 30 calendar days or less is provided as if the employee had remained employed. For military service more than 30 calendar days, employees may elect COBRA/USERRA coverage for up to 24 months or the remaining period of military service, whichever is shorter. Employees who do not elect to continue coverage during military service can be reinstated into the health plan when reemployed by contacting the Benefits Administrator within 30 days of return.

In order to be eligible for reinstatement, an employee must have provided advance notice of the need for military leave (where required) and have completed his or her service on a basis that is not dishonorable or otherwise prohibited under USERRA. Employees whose military service will be for fewer than 31 days must report to back to work at the beginning of the first full, regularly scheduled work day following completion of service, after allowing for a period of safe travel home and eight hours of rest. Employees whose military service will be for more than 30 days, but fewer than 181 days must apply for re-employment within 14 days after completing service. Employees whose service is greater than 180 days must apply for re-employment within 90 days after completing service.

As with other leaves of absence, failure to return to work or to reapply within applicable time limits may result in loss of reemployment rights. Full details regarding reinstatement are available from Human Resources.

In general, an employee returning from military leave will be re-employed in the position and seniority level that the employee would have attained had there been no military leave of absence. If necessary, the Company will provide training to assist the employee in the transition back to the workforce.

Vacation and other paid time off benefits do not continue to accrue during a military leave of absence. An employee returning from military leave is entitled to any unused, accrued vacation benefits the employee

had at the time the military leave began minus any vacation benefits the employee chose to use during the leave. Upon reinstatement, the employee will begin to accrue vacation benefits at the rate they would have attained if no military leave had been taken.

D. Personal Leave of Absence

First Student may grant a Non-Medical Personal Leave of Absence, due to extenuating circumstances, to full-time and part-time employees who have completed at least six months of continuous employment. A Non-Medical Personal Leave of Absence is defined as up to a 30 calendar day period, agreed upon and approved by the Company. Non-medical personal LOA is approved or denied based on the business needs of the location. This is a discretionary decision made by the Location Manager or Region Human Resources. Personal LOA must be initiated through your manager and cannot be approved by the third-party leave administrator.

First Student may also grant a non-FMLA Medical Leave of Absence to full-time and part-time employees. After an employee submits a request for non-FMLA medical leave, the Location Manager and/or Human Resources will engage in a formal interactive process with the employee to identify the precise limitations resulting from the employee's condition and leave accommodation appropriate for those limitations.

A Leave of Absence (personal or medical) is unpaid, unless required to be paid under state or local law or if covered by an applicable wage-replacement benefit program. However, employees are required to use available accrued vacation and other paid time off during a personal Leave of Absence to the extent permitted by law. The employee must provide the leave administrator with notice and any supporting documentation if they cannot return to work on the date approved and scheduled for them to return.

The employee may be reinstated to the same or equivalent position of employment that the employee occupied prior to taking the personal leave of absence whenever possible, or if it is required by federal, state, or local law.

E. Sick Leave

For employees working in a jurisdiction with a mandatory sick leave law, the Company will comply with all legal requirements regarding time off, employee pay, and benefits continuation. As with other types of leave, the employee may be required to provide information and/or certification of the sick leave to our third-party leave of absence administrator.

F. Other Leaves of Absence

Many states or an applicable CBA may require First Student to provide employees with additional leaves of absence. Please contact our third-party leave of absence administrator with any questions regarding leave entitlements.

G. Reasonable Accommodation

The Company will provide a reasonable accommodation to qualified individuals with a disability unless doing so would pose an undue hardship on the Company or poses a direct threat to the health and safety of the individual or others. It is the employee's responsibility to inform the Location Manager or Human Resources Representative, in writing, when possible, if there is a need for a reasonable accommodation due to a disability. The employee's manager and/or Human Resources Representative will engage in a formal interactive process with the employee to identify the precise limitations resulting from the employee's disability and potential reasonable accommodations that could overcome those limitations.

Employees who need an accommodation due to pregnancy, a pregnancy related condition, a disability related to pregnancy and/or childbirth affecting their ability to work must notify their Location Manager and/or Human Resources Representative. Notice must be made in writing, when possible, of the need for a change in her working conditions or environment due to pregnancy/childbirth and provide any supporting documentation which explains the employee's work limitations. The manager and/or Human Resources Representative will engage in a formal interactive process with the employee to identify the precise limitations resulting from the employee's condition and potential reasonable accommodations that could overcome those limitations, such as a leave of absence, modification of job duties, etc.

First Student or its third-party leave of absence, disability, or workers' compensation administrators may request medical documentation to establish the employee's need for an accommodation. Employees are required to cooperate with this process by providing all necessary documentation supporting the need for accommodation and be willing to consider alternative accommodations when applicable. Any medical documentation obtained will be kept confidential and only disclosed on a need-to-know basis.



A. Health and Welfare

We offer a variety of employee benefit options. Benefit options are communicated by the FGA Benefits Center to employees as they become eligible. Insurance benefits, along with all other economic benefits offered, are based on location and employee type. Benefit plans are defined in legal documents such as insurance contracts, plan documents, and summary plan descriptions. If employees are offered benefits, and if a question arises about the nature and extent of plan benefits or if there is a conflict in language, the formal language of the plan documents govern, not the informal wording of this handbook. Plan documents, if applicable, are available for your inspection. The Company and its designated benefit-plan administrators reserve the right to determine eligibility, interpretation, and administration of issues related to benefits offered by the Company. The Company reserves the right to change, cancel, or amend benefits.

The FGA Benefits Center website provides considerable information as well as tools to assist employees and answer benefits questions. All employees of the Company have access to the benefits website. You are able to review, update, enroll, and change benefit elections and personal information. To access the website:

- Log on to www.myfirststop.net
- Enter your user ID and password. For security reasons, first time users will be prompted to register to set up a password

For security reasons, first time users will be prompted to set up a password. If web access is not available to an employee, questions may be directed to the FGA Benefits Center by calling 1-833-277-8056.

Employee Assistance Program

The Employee Assistance Program (EAP) is available to all employees and their dependents. Free and confidential help is available for counseling, work-life balance information, legal guidance, and financial planning. Refer to the contact list at the back of this booklet for details.

B. Years of Service

An employee in good standing, with one or more years of service, who is rehired after voluntarily leaving the Company for not more than six months, will be granted continuous service status with regard to benefits awarded based on years of service. An employee in good standing with five or more years of service, who is rehired after voluntarily leaving the Company for not more than 12 months, will be granted continuous service status with regard to benefits awarded based on years of service.

When a company is purchased by First Student, we will retain employees' original hire dates. When a company is acquired by First Student, we will use the newly established date of hire for service awards. Years of Service affects the accrual of some benefits.

C. Vacation

Some locations may have the opportunity to provide paid vacation time for full-time employees. Contact your Location Manager for specific questions or further details. Accrued vacation time must be used in the current vacation year, generally July 1st through June 30th. Time may not be carried over from year to year, except where state or local law prohibits "use it or lose it" policies. If an employee does not use accrued vacation time in the current vacation year, they will not be paid for it, unless otherwise required by applicable law.

All requests for vacation time must be authorized in advance by the employee's manager prior to taking the time away from work. Failure to return to work on the next scheduled day following a vacation leave may result in disciplinary action, up to and including termination of employment.

An employee who terminates from the Company, voluntarily or involuntarily, will be paid the prorated amount of vacation time allocated but not used based on the last day of employment.

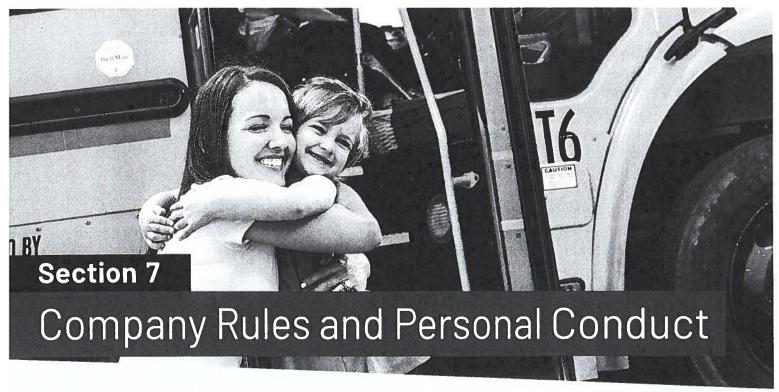
However, if an employee terminates from the Company, voluntarily or involuntarily, prior to the end of the vacation year, and they have taken vacation time that exceeds the prorated earned vacation benefit based on the employee's last day of employment, the employee will be required to reimburse the Company the equivalent of vacation pay taken and not accrued (unless adjusted from final paycheck), in accordance with applicable law.

All company vacation policies will follow state and local laws, where applicable.

D. Employee Discount Program

The Company is proud to work with PerkSpot to offer an employee discount program to you and most often times, your family. Visit firstgroup.perkspot.com for more details.

This program is a one-stop shop for thousands of exclusive discounts in more than twenty five different categories. There is something for everyone! Local offers are available. By indicating your interests the program will show perks that relate directly to you. If you are looking for a specific brand, you can go directly to the brands quick link. Don't see a business? Suggest your favorite brand be added to the program. Support is available to you by phone at 1-866-606-6057 or via email at support@perkspot.com.



A. Employee Misconduct

To ensure the safety of our passengers, orderly operations, and the best possible work environment, First Student expects employees to follow rules of conduct that will protect the interests and safety of all employees and the organization. It is not possible to list all the forms of behavior that are considered unacceptable in the workplace. Some rule infractions may be cause for immediate termination of employment, and some infractions may be subject to lesser forms of discipline, such as verbal and/or written warnings, and/or suspensions from work. This statement of prohibited conduct does not alter or limit the policy of at-will employment.

The infractions listed below are examples, and not an exhaustive list, of unacceptable behavior that may subject an employee to immediate termination of employment:

- Failing to observe or disregarding Company safety processes, policy, or procedures
- Leaving the bus unattended or unsecured
- Falsification of employment application or other Company records and/or documents
- Failure to follow the First Student Payroll Integrity Policy
- Dishonesty, theft, or misappropriation of Company property, including theft of time
- Possession, use, impairment by, or sale of any intoxicating beverage or alcohol/drug infused product, or controlled substance (drugs) while working, on Company property, or while in the possession of a Company vehicle, as well as any violation of the Company Drug and Alcohol Policy
- Violation of the Company's Equal Employment Opportunity or Harassment-Free Workplace Policies
- Violation of the Company Weapons and Violence in the Workplace Policies
- Carrying an unauthorized passenger in a Company vehicle
- Failure to stop at railroad crossings when required by law or Company policy

- Physical or verbal abuse, and/or inappropriate or unwarranted touching of a passenger or employee
- Conviction of a felony or other criminal offense, if job related and consistent with business necessity
- Use of a cellular phone, eating, drinking, vaping, or smoking, while the Company vehicle is in operation. Your personal or work-issued cellular phone must be turned off and stowed while operating a Company vehicle or while operating a personal vehicle on Company business
- Other serious misconduct and or violation of First Student policies and/or rules
- Violations consistent with the location attendance policy, unless otherwise protected by applicable law
- Negligent damage to equipment
- Failure to observe sanitation or disciplinary policies, and/or laws and regulations of the state, school district, or Company
- For individuals operating company vehicles, failure to report a moving traffic violation, citation, and/ or conviction in any vehicle, including personal, in any state, within seven (7) days to the Company
- Deviation from assigned routes unless approved by management and/or the district
- Failure to report a collision, personal injury, or safety-related passenger incident in accordance with Company policy
- Failure to complete required reports in the time and manner required by Company policy
- Insubordination and/or poor work habits (e.g. loafing, wasting time, loitering, excessive visiting, sleeping on the job, disorderly conduct, or improper use of two-way radios, etc.)
- Unauthorized use of Company vehicles
- Other misconduct and/or violations of any First Student policies and rules, whether documented in this Handbok or not

None of the foregoing prohibitions are intended to infringe on any rights granted to statutory employees by the National Labor Relations Act.

B. Prevention of Workplace Violence

At First Student, a safe work environment is fundamental to the success of our employees and our Company. Each First Student employee has the right to expect that their workplace is free from intimidating, threatening, or dangerous behaviors and practices while working for the Company. Threats or acts of violence, including but not limited to, intimidation, bullying, physical or mental abuse, and/or coercion; that involve or affect Company employees or that occur on Company Property will not be tolerated. The offenses and unacceptable behaviors listed below will not be tolerated against fellow employees, customers, vendors, contractors, as well as the general public, and may result in disciplinary action up to and including termination of employment on the first offense:

- Any act or veiled threat of physical, verbal, or emotional abuse, force, violence, or intimidation, including but not limited to hitting, shoving, or other such aggressive conduct directed toward another or used to control or intimidate another individual or their family, friends, associates, or property
- Any pattern of coercive behavior which involves any act or threat of abuse, force, violence,

intimidation, or other aggressive conduct

- Harassing or threatening communications, including without limitation to phone calls, emails, text messages, etc.
- Surveillance or stalking by any means, including but not limited to, physical, telephonic, electronic, or by any camera or video device
- Possession or use of any illegal weapon or device under applicable law
- Intentional destruction of or threats to destroy or damage Company property or Company premises
- Impeding or blocking movement of another person or urging others to do the same
- Using, threatening, or implying the use of any weapon or object that could be used as a weapon
- Enlisting, coercing, or asking others to do any of the above, and/or aiding others in doing any of the above

The Company encourages anyone who sees, hears, or learns of any conduct or statement that seems threatening or suspicious, any conduct that violates this Policy, and/or any weapons on Company premises or in Company vehicles, **immediately** report such conduct or statement, either to their manager, Human Resources, Security, and/or the confidential Ethics and Compliance Hotline at 1–877–322–5534 or contact the Hotline intake site at ethicsfirst.ethicspoint.com. In the event that there is an immediate risk or imminent threat of violence, serious harm, or life-threatening conduct, employees should **immediately call 911**, local police, or other law enforcement.

The Company will not tolerate any retaliation against anyone who, in good faith, reports suspected violation of this Policy or anything related to the issues set forth in this Policy, or who cooperates in any investigation of such report.

C. Tardiness and Absences

First Student is contractually obligated to provide on-time delivery of students. To maintain a safe and productive work environment that is conducive to providing exceptional customer service, First Student relies on its employees to arrive to work regularly and on time for each scheduled workday. An employee's failure to report to work as scheduled can negatively affect the safety of our passengers, the performance of First Student's business operations, and places an undue burden on other employees. If you will be late or absent, you must notify your manager directly as early as possible. Notification should be NO later than the night BEFORE your route, except for emergency situations. You should indicate the reason for being late or absent. Employees will not be required to reveal the nature of any underlying medical condition. If you know you are going to be late or absent for more than one trip or run, please report that fact. If not stated, it will be assumed the call covers one trip or run only.

Tardiness or absence may result in disciplinary action up to and including termination of employment unless the absence or tardiness is legally protected. The following types of time off will not be considered grounds for disciplinary action under this policy:

- Excused time off, including vacation and other approved forms of paid time off
- Sick or safe leave provided under applicable sick or safe leave law

- Approved leaves of absence, including jury duty leave, military leave, leave protected under the Family and Medical Leave Act or similar state laws, time off or leave provided under the Americans with Disabilities Act or similar state laws, leave designated by a Collective Bargaining Agreement, and/or any municipal or local laws
- Time off due to a work-related injury that is covered by workers' compensation

Each situation of absenteeism or tardiness will be evaluated on a case-by-case basis. One unexcused absence or tardiness may be considered excessive, depending upon the circumstances. However, the Company will not subject employees to disciplinary action or retaliation for an absence or for tardiness that is legally protected. If the employee believes that their absence or lateness to work is legally protected, the employee should notify their manager of this fact at the time of the absence or tardiness. If an employee believes they have been mistakenly subject to disciplinary action for an absence or for tardiness that the employee believes is legally protected, the employee should promptly discuss the matter with their manager or Human Resources.

Barring extenuating circumstances or a legally protected reason, if employees fail to report for work without any notification to their manager and their absence continues for a period of three days, the Company will consider the employee has abandoned and voluntarily terminated their employment.

Appropriate standards of attendance ensure that quality service is provided in all areas of our business. Please consult your manager regarding location-specific policies.

D. Telephone Usage

The office will receive and deliver personal messages to Company personnel in the case of emergency only. Any calls of a personal nature will be referred to your home, or a message given to you for call back at another time and place.

E. Personal Appearance

All First Student employees must present a neat and clean appearance, appropriate for the job assigned. If uniforms are provided, they should be kept in good repair and worn every shift or working time. As part of their personal appearance, First Student employees are also expected to observe good habits of grooming and personal hygiene. Body odor should not create distractions. Employees are also encouraged to avoid wearing or applying excessive amounts of perfume, cologne, or other heavily scented items in the workplace.

Depending on the employee's position, protective equipment may be required. The list below includes examples of such equipment. Additional equipment may be required depending on the nature of the work that is being performed.

- Safety vest
- Bump cap
- Safety glasses with side shields

- Face shield
- Welding helmet with shaded eye protection
- Welding apron
- Steel-toe safety shoes and/or boots
- Gloves (work gloves, impervious gloves, etc.)

Individuals may also make a personal choice to wear a facial covering, unless required by federal, state, local, or client requirements.

Items that are not acceptable as proper dress on the job include:

- Shirts or blouses without sleeves below the shoulder, such as tank tops, halter-neck tops, shirts which expose the midriff, etc.
- Shirts and slacks that have a "torn off" look
- Clothes with holes, tears, or un-repaired damage
- Sandals, clogs, platforms, or any footwear other than fully enclosed flat heeled shoes with no more than 3/4 inch heel
- Inappropriate footwear for the weather condition
- Any clothing displaying threats, epithets, derogatory comments based on a protected status (e.g. race, sex, religion, etc.), slurs, or that depict unlawful conduct
- Shorts with inseams less than 5 inches
- Tight fitting or body fit clothing (e.g. spandex and muscle shirts)
- Loose or hanging clothing, jewelry, or other accessories that could become caught on vehicle equipment or moving parts of the vehicle or pulled on by passengers

The Company has the sole discretion to determine an appropriate dress code. Any employee who violates the dress code may be sent home to change and will be subject to disciplinary action, up to and including termination of employment.

Religious, Medical, and Disability Accommodations

The Company will reasonably accommodate exceptions to this policy if required due to an employee's sincerely held religious beliefs, medical condition, or disability. Employees who need such an accommodation should contact the Human Resources Department.

F. Exit Interviews

If employees are considering or have chosen to leave the Company, please provide the Location Manager with appropriate notice. An exit interview may be scheduled to gather your feedback.

G. Use of Cell Phones and Other Electronic Devices

Personal cell phone use for personal reasons during working time must be strictly limited. Cell phones issued by the Company to employees are intended for business purposes only. Employees out of town on business should use a Company cell phone for business calls. Cell phones issued to salaried employees are intended for business use, recognizing that salaried employees are allowed to use the Company issued unit for

personal use within the limits of the phone service plan provided by the Company. Cell phone calls should not be taken during any business meetings unless an emergency condition exists.

Employees may not use any type of cell phone, cell phone accessories, including voice, image, and text messaging, or other electronic devices while driving on Company business or driving and/or walking on Company owned or occupied property, in a workshop, or while climbing or descending stairs. This includes while operating a Company vehicle, vehicle rented for Company business, and/or operating a personal vehicle. For safety reasons, cell phones are only permitted to be used in designated "Cell Phone Zones." Employees are not permitted to walk through the yard and talk on the cell phone. This includes the use of hands-free devices.

All cell phones and other cellular devices must be turned off and stowed out of sight while a driver is operating a Company vehicle. It is not acceptable to have the cell phone powered on, even if in vibrate or silent mode.

In recognition of the significant privacy interest of school children, no employee may take a photograph, video, or audio recording of any student or student information, at any time, while employed in duties on behalf of the Company. Due to safety and child privacy concerns, under no circumstances are cell phone cameras or videos permitted to be used in the presence of school children or where student information is visible, except for business purposes and with prior approval from management. Unauthorized actions under this rule could compromise legitimate Company business activities and violations may result in disciplinary action up to and including termination of employment on the first offense.

For the purposes of this Section, "Driving" means being in control of a vehicle, even when the vehicle is stationary with the engine running.

"Non-driving" means the vehicle is parked in a safe place with the gear selector in Neutral or Park with the emergency and/or parking brake applied and the engine turned off.

"Cell phone" includes, but is not limited to cellular and mobile phones, mobile or other electronic devices for personal communication, handheld or hands-free electronics devices, ear buds, blue tooth, voice recognition, etc.

Violations of this policy may result in disciplinary action, up to and including termination of employment.

H. Company Property

The Company's confidential and proprietary information is vital to its current operations and future success. Each employee should use all reasonable care to protect or otherwise prevent the unauthorized disclosure of such information. The unauthorized access to or disclosure of the Company's confidential and proprietary information via any method of communication, is strictly prohibited and may be subject to discipline up to and including termination of employment and referral to law enforcement for criminal prosecution. Employee obligations with respect to maintaining the confidentiality of such information continue even after separation from employment with the Company.

"Confidential Information" refers to a piece of information, or a compilation of information, in any form (paper, electronic file, or otherwise), related to the Company's business that the Company has not made public or authorized to be made public, and that is not generally known to the public through proper means. Confidential or proprietary information includes, but is not limited to, nonpublic information regarding the Company's business methods and plans, databases, systems, technology, intellectual property, know-how, marketing plans, business development, products, services, research, development, inventions, financial statements, financial projections, financing methods, pricing strategies, customer sources, employee health and/or medical records, system designs, customer lists, methods of competing and training materials and workbooks. Additionally, employees who by virtue of their performance of their job responsibilities have access to the following information, should not disclose such information for any reason, except as required to complete job duties: social security numbers, driver's license or resident identification numbers, financial accounts, credit or debit card numbers, security and access codes or passwords that would permit access to medical, financial, or other legally protected information.

Confidential Information does not include information lawfully acquired by non-management employees about wages, hours, or other terms and conditions of employment, if used by them for purposes protected by Section 7 of the National Labor Relations Act such as joining or forming a union, engaging in collective bargaining, or engaging in other concerted activity for their mutual aid or protection. Under the 2016 Defend Trade Secrets Act (DTSA): (1) no individual will be held criminally or civilly liable under federal or state trade secret law for the disclosure of a trade secret (as defined in the Economic Espionage Act) that: (A) is made in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney; and made solely for the purpose of reporting or investigating a suspected violation of law; or, (B) is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal so that it is not made public; and, (2) an individual who pursues a lawsuit for retaliation by an employer for reporting a suspected violation of the law may disclose the trade secret to the attorney of the individual and use the trade secret information in the proceeding, if the individual files any document containing the trade secret under seal, and does not disclose the trade secret, except as permitted by order in that proceeding.

When terminating employment with the Company for any reason, all Company property including uniforms, ID Cards, keys, computers, cell phones, corporate credit cards, and any other Confidential or proprietary Company information or property must be returned immediately. Confidentiality obligations apply after separation of employment as permitted by applicable law.

If, as a part of employment with the Company, an employee enhances or invents any item or material that relates to Company employment, those items or materials are the property of the Company and remain its property. If there are any questions about this policy, contact Human Resources.

I. No Expectation of Privacy

Computers, software, voicemail, cell phones, tablets, lockers, desks, etc., provided to employees for use in performance of their jobs, are the sole property of the Company.

As such, employees have no right of privacy in anything they create, store, send, or receive using the Company's computers, software applications, systems (including email), phones or other equipment,

or resources. There is also no expectation of privacy related to the Company provided lockers, desks, mailboxes, etc.

The Company has the right to monitor, search, investigate, and log any and all of its resources provided to employees.

J. Computer Security Awareness and Confidentiality

The Company has significantly invested in telephone lines, fax machines, photocopiers and other types of business equipment, internet access and software that are vital to keeping our operations flowing smoothly and effectively. The Company's resources are limited and, except as provided in the Electronic Resources policy below, should be used for business transactions with the exception of incidental or limited personal use during non-working time.

Electronic Resources

This policy describes the Company's general guidelines for using its electronic resources, including electronic mail (email), voicemail, internet access and computer systems.

Employees should use the Company's electronic resources with the understanding that these resources are provided for the benefit of the Company's business. Employees may use company electronic resources, including email, for personal use, during nonworking time, as long as such use complies with company rules, Acceptable Use Policy, and applicable laws. Employees should never use the Company's electronic resources for personal use in a manner that interferes with their work duties or any responsibilities to customers.

Sending, saving, accessing, or viewing obscene or similarly offensive material on the Company's electronic resources is prohibited. Messages stored and/or transmitted by the Company's electronic resources, including the computer, voicemail, email, or the telephone system, must not contain content that may reasonably be considered to be obscene or other patently material. Prohibited material includes, but is not limited to, sexual comments, jokes or images, racial slurs, gender-specific comments, or any comments, jokes or images that would discriminate against or harass someone on the basis of his or her race, color, sex, age, national origin or ancestry, disability, or any other category protected by federal, state or local law. Likewise, any use of the internet, email, or any other electronic resource to engage in harassment or discrimination prohibited by Company policies is unlawful and strictly prohibited. The Company Property Policy in this Handbook, including the Confidentiality provisions of this Policy, apply to electronic information.

Additional guidelines for use of the Company's electronic resources include:

 You should not disclose, or post images or video of, any of the Company's trade secrets or confidential information. Trade secrets may include information regarding the development of systems, business processes, products, know-how and technology. Confidential information may include nonpublic information regarding the Company's business methods and plans, databases, systems, technology, intellectual property, know-how, marketing plans, business development, products, services, research, development, inventions, financial statements, financial projections, financing methods, pricing strategies, customer sources, employee health/medical records, system designs, customer lists, methods of competing and training materials and workbooks.

- You may use the Company's electronic resources for non-business purposes as long as that activity takes place only during nonworking time, does not interfere with your co-worker's job responsibilities, and complies fully with all Company policies. Such non-business use is subject to all Company policies.
- Visiting internet sites that are pornographic or promote gambling
- Encrypting files using software not provided by the Company
- Using another person's login and password for any reason
- Streaming music and videos
- During working time, you should not visit a blog or chat room except for legitimate business purposes.
- Employees may not use their Company email address to register for any external social media account or site.
- You may not use the Company's electronic systems for any illegal purpose.
- Respect the intellectual property (IP) rights of the Company and others. You should not use, copy,
 publish or post the Company's or someone else's IP unless you have the legal right to do so. Examples
 of IP include trademarks, written articles, merchandise information and music. The Company cannot
 and will not provide employees with legal advice about intellectual property laws, unless the inquiry
 relates to the Company's own business interests.

Solicitation

The Company's electronic resources must not be used for solicitation purposes during working time. The Company's Solicitation and Distribution of Literature policy applies to the use of electronic resources.

Software Code of Ethics

Employees may not duplicate any licenses, software or related documentation for use either on the Company's premises or elsewhere unless the Company is expressly authorized to do so by agreement with the licenser. Unauthorized duplication of software may subject users and/or the Company to both civil and criminal penalties under the United States Copyright Act. Employees may not give software to any outsiders including contractors, customers or others. Employees may use software on local area networks or on multiple machines only in accordance with applicable license agreements. Employees may not download software from the internet and install it on their computers.

The Company reserves the right to audit any company computer to determine what software is installed on the local drive(s).

Employee Responsibility

Each employee is responsible for the content of all text, audio or images that they place or send using the Company's electronic resources. The same standards should be utilized for the creation of email messages in connection with an employee's work as would be utilized for other company correspondence or memoranda.

Computer and Systems Security

All computers and the data stored on them are, and remain at all times, the property of the Company. As such, all messages created, sent or retrieved over the internet or the Company's electronic mail systems

are the property of the Company, and should be considered company information. The Company reserves the right to retrieve and read any message composed, sent or received using the Company's electronic resources, including all computer equipment and the electronic mail system, for any business reason, including but not limited to, ensuring compliance with this and all company policies.

Employees shall have no expectation of privacy and the Company reserves the right to monitor and audit the operation of the email, internet and other electronic systems to access and periodically review any or all the records within them, and to retain or dispose of those records, as it deems necessary, without notice to the user. Anyone using any system expressly consents to such monitoring and is advised that if such monitoring reveals possible evidence of illegal activity, the Company may provide the evidence to law enforcement officials.

Employees should be aware that even when a message is deleted or erased, it is still possible to recreate the message; therefore, ultimate privacy of a message cannot be ensured to anyone. Accordingly, internet and email messages are not private. Employees should also be aware that duplicates of email transmitted through a personal, web-based email account using company equipment could be stored on that equipment; likewise, information regarding internet sites that an employee has accessed may also be stored.

Email Content Screening

The Company maintains the right to screen all inbound and outbound email content. Email messages or attachments that contain obscene or similarly offensive material may be quarantined and held from transmission or receipt until the sender or recipient can verify the message or attached document is work related.

The Company may, in its discretion, review communications to and from a personal account, subject to state laws regarding attorney-client communications.

If an employee wants to communicate with an attorney or send an otherwise confidential piece of communication that he or she does not want the Company to monitor, the employee should consider using a personal email address and personal computer equipment. If an employee does use company equipment, he or she consents to any monitoring by the Company and should understand that he or she has no right to privacy with respect to such communications, to the extent permissible under applicable law.

Virus Protection

To prevent computer viruses from being transmitted through the system, employees are not authorized to download any software from the internet onto their computer or any drive in that computer.

Passwords

Employees must select confidential password(s) and manage them in accordance with the Company's Password Guidelines to use with your system account(s) and are responsible for all actions associated with your accounts and passwords. Do not share your account information and passwords with others. If you believe that your password has been compromised, you must immediately notify the IT Service Desk.

Should an employee gain knowledge of a breach in security of any kind, the employee shall immediately notify his or her manager. Employees shall take all appropriate action, whether by instruction, agreement, or otherwise, to ensure the protection, confidentiality, and security of confidential information.

Violations of this policy may result in discipline, up to and including termination of employment.

If you have any questions about this Policy, consult your manager or contact the Human Resources department. Employees should also refer to the Company's intranet for the complete and current version of the Company's Acceptable Use Policy.

K. Media

To ensure that the Company communicates with the media in a consistent, timely, and professional manner about matters related to the Company, employees should notify the Location Manager that they have been contacted by the media whenever they are asked to speak on behalf of the Company so that the Company knows that a media inquiry has been made. Do not respond to media inquiries on the Company's behalf without authorization; instead, reach out to FGA.comms@firstgroup.com to explain about the inquiry. This rule does not prevent employees from speaking with the media, but they should not attempt to speak on behalf of the Company unless they have specifically been authorized to do so by an officer of the Company.

Social Media

The Company has a dedicated social media presence which is utilized by the Company and subsidiaries to communicate with the public, generate good will, and/or resolve disputes. Only personnel authorized to do so by the Company as part of their job descriptions may post, transmit, or communicate with the public utilizing the Company and any subsidiaries' owned and operated social media platforms and handles. Any employee who posts to or from the Company and/or subdiaries' social media platforms without permission will be subject to discipline, up to and including termination.

The Company also recognizes that employees may engage in social networking for personal or business-related reasons while off duty. "Social networking," for purposes of this policy, means posting or uploading information, photos, videos, links, opinions, images, memes, GIFs or anything else on a personal or public website, social networking or affinity website, bulletin board, or chat room. This includes sites like Facebook®, Instagram®, TikTok®, SnapChat®, LinkedIn®, and other similar sites.

Employees who engage in personal, non-work-related social networking should be mindful that their postings, even if done off site and off duty, could have an adverse effect on the Company and/or subsidiaries' legitimate business interests and/or subject the employee or the Company and/or subsidiaries to liability. For example, the information posted could be the Company's (or another's) trade secret, copyrighted, or confidential business information. In addition, some readers may view the employee as a de facto spokesperson for the Company even when employees are acting in their own personal capacity. To reduce the risk of legal liability for employees, the Company, and/or their subsidiaries, the Company asks that employees observe the following guidelines:

NEVER engage in social networking using any Company resources during working time, including
the Company or any subsidiaries' computer systems or smartphones, unless doing so is part of the
employee's job duties and they are doing so on behalf of, and with explicit authorization from the

Company and/or their subsidiaries

- NEVER disclose any Confidential Information or trade secrets, as defined in this Handbook or as
 defined in any separate non-disclosure agreement employees may have with the Company and/or any
 subsidiaries of the Company
- Conform social networking to comply with all of the policies in this Handbook, including but not limited to, the Company's policies against harassment, discrimination, and workplace violence
- Photos or videos of coworkers may not be posted to social media without their express consent.
- If the social networking includes any information related to the Company, please:
 - o Ensure it is clear to the employee's readers that the views expressed are theirs alone and that they do not reflect the views of the Company or subsidiaries
 - o Do not maliciously defame or otherwise discredit the products or services of the Company, its partners, affiliates, customers, or vendors
 - o Do not maliciously defame any employees of the Company or any subsidiaries
 - Do not unlawfully use a trademark, other proprietary and protected logos, or graphics or photographs of the premises or products of the Company, its partners, subsidiaries, affiliates, customers, or vendors

Notwithstanding, the foregoing is not intended to restrict statutory employees' rights under the National Labor Relations Act to discuss terms and conditions of employment. If you need clarification of any aspect of this policy, please contact Human Resources.

Failure to comply with this policy may lead to discipline up to and including termination and if appropriate, the Company will pursue all available legal remedies.



A. General Rules and Regulations

This procedure on driver standards outlines the minimum standards for driver discipline. This procedure is preempted by any state or local law, or any school bus contract that requires more stringent standards.

Violation of any of the following requirements will result in disciplinary action, up to and including termination of employment:

- Leaving the bus unattended or unsecured or allowing passengers to disembark at a wrong stop.
- Carrying an unauthorized passenger in a Company vehicle.
- Not following the sleeping child/passenger inspection procedure.
- Deviation from assigned routes unless approved by management and/or district.
- Using an electronic device, eating, or drinking while the Company vehicle is in operation. Any items brought on the bus must be secured away from the driver's reach and can only be consumed during scheduled breaks when NO passengers are on board and the vehicle is safely secured.
- Use of tobacco products and/or electronic delivery systems while driving, in a school bus, or while on school property with or without passengers present.
- Mounting a "drink holder" device in any Company vehicle.
- Use of profane or indecent language.
- Turning "right on red", except when required by law.
- Fueling a bus with passengers in the bus or while the motor is running. The driver will hand pump the
 fuel without use of a locking device and shall wear all required personal protective equipment and
 follow the "Fueling Policy" procedures.
- Failure to report a collision, personal injury, or safety-related passenger incidents and complete required reports in the manner and time required by Company policy.
- Disobeying all railroad crossing laws and all other laws, rules, and regulations applicable to the operation of school buses. Drivers must activate 4-way hazard lights, stop, place the transmission

in "neutral", secure the parking brake, open the driver window and bus service door at all railroad crossings, look and listen. Once the driver has determined it is safe to cross the tracks, the service door will be closed before the bus proceeds. Deactivate the 4-way hazard lights as the bus reaches the safe operating speed. First Student buses will stop at all railroad crossings, unless clearly marked exempt or having an authorized person directing traffic, whether carrying passengers or not.

- Failing to conduct the proper pre-trip inspection as required by laws and regulations and the Company; to include cleanliness of windows, aisles free from damage and obstructions, outside mirrors and lights. It is important that drivers also look for objects inside or that may have been placed there by unknown persons with the intent to create harm and damage. Please follow the directions as provided for this purpose, these may change from time-to-time as we learn more about outside threats. Any object found that does not belong in or on a vehicle must be IMMEDIATELY reported to a supervisor. DO NOT TOUCH OR ATTEMPT TO REMOVE THE OBJECT. When on a trip or the vehicle is parked out and the driver returns to the vehicle it is necessary to inspect for such objects.
- Obstructed aisles and emergency exits while transporting passengers.
- Open bus doors while the bus is in motion.
- Exceeding **exceed five (5) MPH** with any Company vehicle on Company property. Drivers must comply with the posted speed.
- Use of a cell phone and/or other cellular device while operating a Company vehicle. In those locations where a NEXTEL system is used in place of two-way radios, drivers shall follow the Company instructions for using the system.
- Physically touching students, unless necessary to protect themselves or another passenger; for example, when a student is choking, or an assault is taking place.
- Backing without assistance when it is necessary to back a First Student vehicle on Company property. It shall be the driver's sole responsibility to secure the bus and be certain that the way is clear before moving the vehicle backwards. When on trips drivers should be careful to not drive the vehicle into a situation that requires backing to get out. In those rare situations where backing is the only choice or becomes necessary, the driver is to enlist help from one of the adults on the vehicle to provide backing assistance. Drivers are not to ask a student to help with backing, no matter what age the student may be. If away from the yard on a trip and no assistance is available, and the bus does not have passengers on board, the driver is to secure the vehicle, get out, and look before performing the backing.
- Failing to secure driver seat belt properly at all times while operating a Company vehicle.
- Idling a First Student vehicle for more than 3 minutes while not in transit. Exceptions include (1) conditions that might compromise passenger safety, such as extreme cold weather; (2) idling while stopped in traffic; or (3) repairs or maintenance that requires the vehicle to be running. Please refer to the First Student Anti-Idling Policy, the postings at the location, or management for questions.
- Use of any GPS other than Company-issued devices, except with prior approval from the Senior Director of Safety.

B. Sleeping Child/Passenger Protection

It is the responsibility of each driver, attendant, and technician to follow, without exception, the Company procedures for performing the Sleeping Child/Passenger Inspection Procedure.

The Child Check-Mate Safety System is an electronic child reminder which was developed as an aid to increase child safety and job security. The Child Check-Mate System is activated when the brake pedal is applied, when you engage your 8-way flashers by opening the loading door, or some systems are activated by engaging the marker/headlights. The system cannot be deactivated until the driver walks to the rear of the bus and depresses the "Stop and Check" reset button upon completion of each route. The Child Check-Mate System does not remove the responsibility of the driver to search their vehicle every time the bus becomes empty after completing a tier and before going on to the next school/tier. If the bus is equipped with DriverHub or Zonar, the search must be logged in between route tiers and any time the driver exits the vehicle after the search is completed.

All First Student employees who transport passengers or move our vehicles including, but not limited to, drivers, attendant, and technicians are accountable for performing this critical safety inspection. Any employee operating a First Student vehicle is required to conduct a thorough search of the vehicle prior to exiting for any reason.

Pre-trip Inspection

Child Check-Mate (CCM) System Check - Driver Responsibility

As part of the daily pre-trip or when assigned to an alternate vehicle for the first time, the driver must make sure the Child Check-Mate System is fully operational as follows:

CCM System Inspection Procedure

NOTE: which activation system(s) applies to the employee's location.

1.. Turn key to ON or ACCESSORY position, or start the bus if necessary. An audible sound indicating that the system is functioning should be heard

	Brake Activation		Marker / Headlight		8-Way Light System	
2.	Press the service brake pedal to activate the CCM system. If brake pedal is depressed within 12 seconds after ignition is turned on, an audible sound will be heard, but the CCM System is not activated. If brake pedal is depressed after 12 seconds, an audible sound and the voice message, "Child Check-Mate is now activated. Child Check-Mate self-check confirmed" will be heard indicating the system is now armed.	2.	Engage appropriate light to activate system. Once system is activated, there will be an audible sound indicating the system is now armed, and/or the voice message, "Child Check-Mate is now activated. Child Check-Mate self-check confirmed." NOTE: With the marker/ headlights on, the driver is permitted to remove the key and escort children across the street without having to disarm the system at every stop. (~10-minute window) WHERE REQUIRED BY STATE LAW ONLY!	2.	With front door closed, turn the master switch on and activate warning lights. Open front door, red alternating school lights should be flashing at this point. An audible sound will be heard the moment these lights are activated, and/or the voice message, "Child Check-Mate is now activated. Child Check-Mate self-check confirmed." Close front door, red alternating school lights will stop flashing.	

3. Turn the ignition to OFF position

- The system alarm, a high-pitched beeping, should begin to sound and dome lights will come on
- After approximately 8 seconds, the bus horn should start to pulsate off and on
- This system is designed in such a manner that the ignition key must be turned off for at least 1 second and then back to ON or ACCESSORY position

4. Turn the ignition back to ON or ACCESSORY position

- The alarm should be silenced in either position; the dome lights will remain on
- An audible chirp and/or voice message, "Please conduct your child search now" will be heard
- 5. Proceed to the rear of the bus, always searching for children
- 6. Press the reset button and hold for at least 2 seconds
 - A rapid chirping indicating deactivation sounds, and/or a voice message, "Child Check-Mate is now deactivated"
 - Dome lights remain on for 45 60 seconds (depending on vehicle)

7. The system has been deactivated

- 8. **Indicate "CCM DAILY CHECK PERFORMED"** on DVIR/Log Book or check appropriate box depending on specific form used once completed
- 9. Remove the key from the ignition before exiting the vehicle

Note: Some systems may have dome light activation. If in doubt, ask your supervisor.

Prohibition Against Tampering with Child Check-Mate Device

Only trained, authorized persons may make changes or repairs to the CCM system. At no time is any other person to tamper with the system.

"Tampering" means to attempt to render the device incapable of proper and effective action or to materially impair the functioning of the device.

Weekly Horn Verification

- The driver must also perform a weekly verification allowing the horn to activate
- This may be checked after boarding the bus by waiting for the horn to sound before turning the key to ON or ACCESSORY
- Drivers must follow speci ic location procedures for performing the weekly horn verifications
- Drivers shall indicate "HORN VERIFICATION PERFORMED" on DVIR/Log Book or follow specific location procedures for documenting

Usage of Bus Empty Sign or Placard

- The driver must ensure the vehicle is equipped with the Bus Empty Sign and/or Placard
- The sign and/or placard is displayed in the rear of the vehicle, every time it is parked, and the driver is exiting. This is a visual verification the bus was searched for sleeping children and/or passengers
- Each and every time a vehicle is left "unattended" and after the child and/or passenger search is performed, the sign and/or placard must be placed in the rear of the vehicle attached in an upper window or rear door easily viewed from outside
- The child search is performed first and separate from hanging the sign and/or placard to focus on the

- search. The sign and/or placard is used in conjunction with the pre/post trips
- Before a vehicle is driven, the sign and/or placard must be removed and secured in the driver area; at no time is it to be displayed while the vehicle is being driven
- Every time a driver parks the vehicle and will be leaving it unattended, the driver will inspect the vehicle, take the sign and/or placard from the secured location, and hang it as indicated above
- This procedure applies to wherever the vehicle is parked—on company property, the employee's home, in a public place, or on private property—and must be followed

Specific procedures for sign and/or placard removal and display are included in the steps below for the Run/Route Child or Passenger Search Inspection.

Run/Route Child/Passenger Search Inspection

If wearing sunglasses, remove them before beginning the search. If daylight is reduced, turn on interior lights.

Run – each school or assignment during a particular route, e.g., high school, middle school, elementary school is considered a run within the route.

Route – the combination of all runs for each AM, Midday (MD), and PM route assignment.

AM, Midday, PM Inspection Procedure

- 1. Before leaving the parking location to begin the route, as part of the daily pre-trip, the driver shall:
 - Perform the Child Check-Mate pre-trip ensuring the system is operational
 - Remove the Bus Empty sign and secure it in a storage area in the front of the bus
 - If no sign is present, driver must obtain one before using the vehicle. If parked-out, call dispatch for guidance
- Before the first child enters the vehicle, the driver must ensure the Child Check-Mate System is activated and remains armed by whichever system the bus is equipped with, the 8-way light system, headlights, or brake lights

Home to School "Take In" AM or MD School to Home "Take Out" MD or PM 3. After unloading at school and before leaving the 3. After the last stop or drop off from each school and school property the driver and attendant shall: before going to the next school the driver shall: · Walk the inside of the bus to the last seat, · Pull the bus over out of traffic in a safe location, searching on and under each seat for children or activate the 4-ways, and secure the bus by shifting to passengers and any personal items left on the bus neutral, and setting emergency/parking brake · After ensuring the bus is empty and all personal Walk the inside of the bus to the last seat, searching items have been collected, the driver may continue on and under each seat for children or passengers and to the next run any personal items left on the bus 4. For each completed run the driver shall perform the Before continuing to the next school on the route the procedure outlined above in "3" prior to leaving school driver and attendant must ensure the bus is empty grounds and all personal items have been collected 4. For each completed run the driver shall perform the procedure outlined above in "3" prior to leaving school grounds

- 5. When the route is complete and before leaving the bus unattended, a "final" inspection of the bus interior must be performed for sleeping children or passengers and any personal belongings left behind
- 6. Before removing the key and exiting the driver shall:
 - Search for sleeping children or passengers on and under each seat, while walking to the last seat
 - This search is performed before beginning the post trip inspection
- 7. When the driver is satisfied there are no sleeping children or passengers on-board, the driver shall:
 - Perform the post trip inspection
 - Take the Bus Empty Sign and/or Placard from its storage place and walk to the back of the vehicle, always searching
 - Hang the sign and/or placard in the rear of the vehicle, attached in an upper window or rear door, easily viewed from outside
 - Press the Child Check-Mate reset button
- 8. In addition to the above procedure, if the vehicle is "parked out," the driver will contact dispatch to verify the search has been completed and the bus is empty

Charter, Sports Trips, and Field Trips

A. Yard to pick-up point

- Before leaving the parking location to begin the trip, as part of the daily pre-trip, the driver shall:
 - o Perform the Child Check-Mate pre-trip ensuring the system is operational
 - o Remove the Bus Empty Sign and/or Placard and secure it in a storage area in the front of the bus
 - o If no sign and/or placard is present, the driver must obtain one before using the vehicle. If parked-out, call dispatch for guidance

B. Pick up-point to destination

- Before the first child and/or passenger enters the vehicle at the pick-up point, the driver must ensure the Child Check-Mate system is activated and remains armed while passengers are being transported
- After unloading at the destination, walk the inside of the bus to the last seat, searching on and under each seat for children and/or passengers and any personal items left on the bus
- If the vehicle will be left unattended, before turning off the bus and exiting, the driver shall:
 - Search for sleeping children and/or passengers on and under each seat while walking to the last seat
- When the driver is satisfied there are no sleeping children and/or passengers on-board, the driver shall:
 - Take the Bus Empty Sign and/or Placard from its storage place and walk to the back of the vehicle
 - Hang the sign in the rear of the vehicle, attached in an upper window or rear door, easily viewed from outside
 - Press the Child Check-Mate reset button

C. Return to pick-up point

 Before beginning the return trip, remove the Bus Empty Sign and/or Placard and secure it in a storage area in the front of the bus

- Before the first passenger enters the vehicle, the driver must ensure the Child Check-Mate System is activated and remains armed while passengers are being transported
- After unloading at the pick-up point, walk the inside of the bus to the last seat, searching on and under each seat for children and/or passengers and any personal items left on the vehicle

D. Return to yard or park-out location

- When the charter is complete, before turning off the bus and exiting, the driver shall:
 - Search for sleeping children and/or passengers on and under each seat while walking to the last seat
- When the driver is satisfied there are no sleeping children and/or passengers on-board, the driver shall:
 - Take the Bus Empty Sign and/or Placard from its storage place and walk to the back of the vehicle
 - Hang the sign in the rear of the vehicle, attached in an upper window or rear door, easily viewed from outside
 - Press the Child Check-Mate reset button
- The driver shall follow the location procedure for notification to dispatch after normal business hours the bus has been searched and is empty

Vehicle Park-out

Any time a driver parks and exits the vehicle NOT parked in the bus yard, it is considered a park-out vehicle.

- Dispatch must have a log to verify the driver of each parked-out vehicle has called in to verify the
 vehicle has been searched following each AM, MD, and PM route or anytime the driver leaves the
 vehicle unattended
- This search is to be done prior to performing a "post-trip" of the vehicle itself
 - o If the vehicle is equipped with ZONAR this passenger search shall be logged
 - If the vehicle is equipped with a paper DVIR/Log Book the passenger search shall be logged at as directed
- The driver is then required to call dispatch confirming this action is complete

DriverHub/ZONAR Child/Passenger Search

If the vehicle is equipped with DriverHub ZONAR, it must be used to log the search in between route tiers and any time the driver exits the vehicle after the search is completed. Follow equipment use guidelines for logging search.

Technician Search Responsibilities

A. Moving Vehicles for Servicing

Whenever a technician moves a parked First Student vehicle into the shop for repairs, upon entering the vehicle, the technician shall walk the interior of the vehicle searching for sleeping children and/or passengers on and under each seat before moving the vehicle.

B. Road Call

Whenever a technician arrives on the scene of a service call and finds the First Student vehicle has already been vacated, the technician is responsible to walk the interior of the vehicle searching for sleeping children and/or passengers on and under each seat before performing any repairs or preparing the vehicle for towing.

C. System Failures

The driver discovering a system malfunction shall document in the DVIR and report the defect to the maintenance personnel and Location Manager immediately. The maintenance technician shall diagnose the system and if able to correct the defect, perform the repair, and return the bus for active service.

If the system requires repairs which may not be made immediately the bus may continue to be used for service under the following condition:

- The Location Manager shall require a second person to inspect the bus immediately upon its return to the lot and before the driver exits the bus
- Buses which have a system malfunction may not park out
- Prohibition Against Tampering with Child Check-Mate Device.
 - Any employee who tampers with a Child Check-Mate device is subject to immediate termination of employment. This does not apply to technicians performing maintenance related functions to the bus or the device
 - "Tampering" means to attempt to render the device incapable of proper and effective action or to materially impair the functioning of the device

C. Collisions and/or Work-Related Injuries

Should a driver be involved in a collision, the first responsibility is for the safety and well-being of the students and/or passengers on the bus. While working, any driver involved in a collision MUST contact First Student dispatch allowing appropriate calls to be placed. DO NOT move your bus until instructed by a police officer, dispatch, or a manager. The exception would be if the position of your vehicle places yourself, your passengers or other motorists in immediate danger. Upon return to the location, the collision must be immediately documented and appropriate reporting forms completed as directed by management.

A collision or work-related injury that occurs on First Student property must also be reported immediately to dispatch or management, regardless of the extent of the damage or injury. Any driver and/or attendant who is involved in a collision or work-related injury while on-duty in a First Student vehicle or on First Student property, and fails to properly notify a supervisor may be terminated with the first offense.

Collisions and work-related injuries will be investigated to determine preventability and to identify any skill(s) deficiencies that require enhancement training.

D. School Bus Speeding Violations

It is the policy of First Student that drivers operate Company vehicles at or below, but not to exceed, the posted speed limit. The vehicle speed shall be established based on the posted speed limit, weather and

road conditions, traffic, or any other condition that would warrant operating at a lower speed than what is posted. When traveling on interstate highways, First Student vehicles should not travel in the far-left lane and become a hazard to other vehicles Drivers should only use that lane for short distances to pass slower moving vehicles.

First Student buses providing Home to School and School to Home transportation are not permitted to use High Occupancy Vehicle (HOV) lanes. For charter trips usage of HOV lanes are permitted based upon a risk assessment of the HOV lane provisions. For information, please see your Area Safety Manager.

It must be noted that certain states have different guidelines for the maximum speed a school bus transporting school age children may travel. Each driver is responsible to know these laws and regulations and to follow them without exception.

In the event a driver is convicted of a speeding violation in a school bus at 10 MPH or less in excess of the posted speed limit, disciplinary action will be taken as outlined in the Employee Discipline for Moving Violations Table (Fig.1). If the conviction for speeding in a school bus is more than 10 MPH over the posted speed limit, a more serious penalty may be necessary including suspension or termination of employment, regardless of the driver's previous driving record.

E. Responsibility to Report

It is the employee's responsibility to notify their manager of any of the following events that occur on or off the job within the time frames stated below:

Event	Timeframe		
DUI/DWI Arrest	Immediately		
Moving Violation Conviction	Within seven (7) calendar days of conviction on or off the job		
Collision	Immediately if occurred on the job or before the next shift if occurred off the job		
Incident	By the end of the business day		
Change or Status of License (suspension, revocation, etc.)	Before the next scheduled shift		
Criminal Arrests, Convictions, Pleas of Guilty, and Findings of Guilt	Immediately		

An employee who fails to notify the Company of any of the above occurrences within the time frame indicated will be subject to disciplinary action, up to and including termination of employment.

F. Progressive Discipline

Although employment may be terminated at-will by either the employee or the Company at any time in accordance with applicable law, without following any formal system of discipline or warning, we may

exercise discretion to utilize forms of discipline that are less severe than termination of employment. The following general principles will be considered when determining the proper disciplinary action for moving traffic violations, preventable collisions, preventable incidents, and preventable injuries.

- Multiple infractions may be combined to show cause for suspension or termination of employment earlier than indicated.
- More serious collisions, injuries, and/or incidents may be cause for suspension or termination of employment earlier than indicated.
- Moving traffic violations prior to hire, on or off the job, count, they are not exempt.

Any conviction of a moving traffic violation in any vehicle – Company, private, or other – will result in disciplinary action as outlined in Fig. 1 Moving Traffic Violations which demonstrate reckless disregard for passenger safety (i.e. speeding conviction with passengers on board) may be cause for a jump step up to termination of employment.

Fig.1 Moving Traffic Violations

Violation	Action	
One (1) conviction in last 36 months	Written warning placed in driver file	
Two (2) convictions within 36 months	Disciplinary suspension of three (3) days and suspension notice placed in driver file	
Three (3) convictions within 36 months	Termination of employment	

There may be circumstances that may warrant greater disciplinary action than that listed in **Fig. 1**, up to termination of employment.

In the event a driver is involved in a preventable collision, or a driver (or a driver and attendant) fail to check a bus for sleeping children and/or passengers, the disciplinary action that may be taken is outlined in **Fig. 2 Preventable Collisions and Failing to Check for Sleeping Children/Passengers**.

The term "failure" is defined as anytime a driver and/or attendant fails to check the bus for sleeping children and/or passengers. Do not follow the required process, or any loss producing event that results in third-party liability and/or damage over \$100.

Fig. 2 Preventable Collisions and Failing to Check for Sleeping Children/Passengers

Number of Collisions or Failures to Check Bus and/or Vehicle	Action
One (1) preventable collision in the last 36 months One (1) failure to check for sleeping children/ passengers	Written warning placed in driver file
Two (2) preventable collisions within 36 months Two (2) failures to check for sleeping children/ passengers	Disciplinary suspension of three (3) days and suspension notice placed in driver file
Three (3) preventable collisions within 36 months Three (3) failures to check for sleeping children/ passengers	Termination of employment

There may be circumstances that may warrant greater disciplinary action than that listed in Fig. 2, up to termination of employment.

A "Jump-Step" is defined as when the violation is serious enough to skip the applicable discipline level and move directly to the "next" level (e.g. event may be an employee's first preventable collision, but the severity moves it to the discipline level of the second preventable collision).

Any backing collision deemed preventable will be an automatic jump to the next level of discipline.

Rear end collisions usually result from inattention and/or failing to maintain a safe, clear following distance. As a result, any rear end collision will be considered as a serious collision and may result in termination of employment for the first offense.

Any condition or act that results in physical damage to any Company vehicle while on or off Company property may be cause for disciplinary action as outlined in **Fig. 3 Preventable Incidents**.

An "incident" is defined as any condition or act that results in physical damage to the Company vehicles or Company property costing less than \$100 for total repairs and does not result in exposure to or payments of any kind to a third party.

Fig. 3 Preventable Incidents

Number of Collisions or Failures to Check Bus and/or Vehicle	Action		
One (1) preventable incident in the last 18 months	Written warning placed in driver file		
Noted in driver file and verbally discussed with driver	Termination of employment		
Two (2) preventable incidents within 18 months	Written warning placed in driver file		
Three (3) preventable incidents within 18 months	Disciplinary suspension of three (3) days and suspension notice placed in driver file		
Four (4) preventable incidents within 18 months	Termination of employment		

There may be circumstances that may warrant greater disciplinary action than that listed in **Fig. 3**, up to termination of employment.

Preventable injuries are those that occur as the result of the employee violating a safety rule, acting in an unsafe manner, or ignoring best safety practices. As a result, disciplinary actions may need to be taken and are reflected in **Fig. 4 Preventable Injuries**.

Fig. 4 Preventable Injuries

Number of Injuries	Action
One (1) preventable injury in the last 36 months	Written warning placed in driver file.
Two (2) preventable injuries within 36 months	Disciplinary suspension of three (3) days and suspension notice placed in driver file
Three (3) preventable injuries within 36 months	Termination of employment

There may be circumstances that may warrant greater disciplinary action than that listed in **Fig. 4**, up to termination of employment.



In order to maintain the highest degree of safety for our passengers, it is in everyone's best interest to establish and enforce driver standards that clearly state the expectations of the Company and itemize the responsibilities of the driver.

A. Annual Driver Performance Review

First Student may also conduct a periodic review of our drivers' overall operating history including motor vehicle records, as a result of but not limited to, an observed driving deficiency, customer complaint, speeding, or reported unsafe driving in addition to those rules and regulations that apply through Federal Motor Carrier Safety Administration (FMCSA), Federal Transit Administration (FTA), and/or state or local laws.

B. Annual Behind-the-Wheel (BTW) Performance Evaluation

Each First Student driver, substitute or spare driver, and staff or technicians that could be used as a substitute or spare driver shall receive a Behind-the-Wheel (BTW) performance evaluation at least once annually.

During this evaluation, skills and competencies are assessed to determine eligibility for continued qualification for driving in any service.

The evaluation shall be performed by a Certified BTW Trainer and shall include, but not be limited to, the application of the Smith System 5 Keys, loading and unloading procedures, railroad crossing procedures, and preand post trip inspection, including all Sleeping Child and Passenger Protection Procedures.

C. Other Testing

In the event that an evacuation becomes necessary due to an accident or other external safety threat, First Student personnel must manage the exit of a large number of students in a safe and efficient manner. A school

bus driver, as well as the attendant, must be physically able to perform an emergency evacuation of the bus at any time and must be able to assist students in loading and unloading—whether due to the cognitive and/or physical abilities of students with special needs or injuries sustained in an accident.

To ensure that all school bus drivers and attendants are able to perform the essential functions of the job, including mandatory evacuation and safety duties, First Student implemented Physical Performance Dexterity Testing ("PPDT"). The PPDT is modeled in part after the successful program utilized in the state of New York. The Physical Performance Dexterity Testing evaluates a driver and attendant's dexterity skills, ability to climb and descend bus steps, carry or drag students in a bus emergency evacuation, and exit quickly from an emergency door. Likewise, the specific components of the PPDT have been designed to test the strength and agility needed for those functions. Each task is critical to a school bus driver and attendant's assessment of the need to evacuate, to assess injuries to student and/or passengers, to secure the incident scene, and to minimize further danger or injury to student and/or passengers.

An overview of other testing and requirements are depicted below in Fig 5. Other Testing and Requirements.

Fig. 5 Other Testing and Requirements

Physical Performance Dexterity Testing					
Standard	Time	Demonstrates the ability to	Required for		
Climb and descend steps	30 seconds	Move in and out of bus to attend to students and to perform an evacuation in a timely fashion	Driver and Attendant		
Throttle and brake	10 seconds	Operate pedals quickly in a driving situation	Driver only		
Brake/clutch pedal	5-3 second repetitions	Hold brake and clutch for extended duration as can occur in certain driving situations	Driver only		
Open and close door	N/A	Open the entrance door as a driver is required to	Driver only		
Emergency exit the bus	20 seconds	Exit the bus through an emergency exit in an evacuation	Driver and Attendant		
125-pound weight drag	30 seconds	Drag an incapacitated passenger out of bus and/or away	Driver and Attendant		
Operate controls of bus	8 seconds each	Steer the bus and operate hand controls simultaneously	Driver only		

DOT Testing

Qualified employees must meet DOT requirements, as applicable.

First Aid and Cardiopulmonary Resuscitation (CPR) Training

Each driver and/or attendant must meet minimum state or contractual requirements for first aid training. Where required, drivers and/or attendants will receive CPR training, as well as any other training required by local policy or contractual agreement.

Drivers and attendants shall meet all state requirements.

Meetings

Each driver and/or attendant must attend regularly scheduled and called meetings and/or make arrangements to make-up the meeting.

Dependability

Drivers and attendants must maintain a record of dependability.



The materials included in First Student training programs utilize sound, basic instructional concepts, and principles, along with broad, in-depth development of essentials for effective school bus operations.

Our training program will involve classroom, skills station, and on the road curriculum. The amount of time required for training each school bus driver will vary depending upon prior knowledge and previous experience. There are base core competencies that each employee must complete prior to qualifying as a First Student driver.

Training for all drivers will be documented as it is completed and placed in their active individual training file. Drivers will be held accountable for the training and policies they receive. Documentation will also be a requirement of enhancement training. This is done for the protection of both driver and the Company. If you have any questions regarding training requirements, please contact your Area Safety Manager.

Drivers who are involved in a preventable collision that resulted from a skill deficit will be scheduled for enhancement training. The training topic and skill will be directly related to the type of collision and will vary in the amount of time required. A typical training session will consist of a discussion of the sequence of the collision events and a review of the pertinent Smith System Key(s) in the classroom. This will be followed by on the road training and application of the Smith System Key(s). Additionally, other driving skills may need to be reviewed due to the type of collision. The goal for this training is to improve the driver's knowledge and skill necessary to avoid a similar collision in the future. This training is not part of the disciplinary process related to a collision.

Some of the districts that we serve have established practices and regulations, which they feel, are appropriate to their particular situations while others leave these decisions to our expertise. The training curriculum is developed over two phases: 1) topics required by First Student, 2) topics required by individual states and/or customer contracts. Training is a joint responsibility, the Company will provide the material, equipment, and trainer, and the employee will provide attendance, attention and demonstration of the learned skill, and knowledge.

It is the individual responsibility of the employee to ensure they have met all legal qualifications required by law, rules, and regulations to operate the type of vehicle they are assigned. It is the responsibility of the First Student management staff to ensure all Company requirements are met before an employee is allowed to operate a First Student vehicle.

A. Customer Care

In order to safely operate a school bus with children on board, employees must be able to influence their behavior to minimize distractions to your driving. All drivers and attendants will receive training on "I Care + We Care = Customer Care." By participation in our "Customer Care" training, behaviors can be influenced to prevent distractions from becoming safety issues for employees and our passengers. This training will also help to prevent minor incidents between children from escalating into situations which result in violence.

First has initiated a way of working with our passengers that establishes a climate of mutual care and respect – a proactive approach to customer care.

Our ultimate mission is to provide unmatched care and the safest ride to school, so when students arrive, they've started their day with an exceptional experience and are ready to achieve their full potential. We have identified our three primary customers as:

- Passengers
- Employees
- School Administrators

First Student drivers and attendants know the importance of passenger care and passenger service. Our Customer Care Journey begins below:

- Demonstrating Respect You must be respectful, and model that behavior for our passengers, to be shown that same level of respect from our passengers
- Create and Maintain Relationships building relationships provides a mutual climate of care and respect
- Manage and Share Information Keeping information confidential when appropriate and sharing with the appropriate staff when necessary
- Anticipate Needs the needs of ourselves and our passengers, another example of being proactive
- Provide Structure and Support children need strong role models and a structured atmosphere to feel safe
- Keep Your Skills Development Current First Student provides many opportunities for employees
 to improve and increase their skills professional drivers and attendants embrace and use those
 opportunities to grow and develop with our company

"I Care + We Care = Customer Care"

First Student employees are key ingredients to our success. The entire First Student organization is here to support employees so that they may do their jobs well. Drivers and attendants must remember they are engaged in a public service. The most important people in our business are the school children, passengers,

parents, and school representatives. The individual bus driver in charge of the vehicle is First Student. As such, the bus driver is a major factor in the creation of First Student's public image. There is no substitute for the application of genuine courtesy and a friendly, helpful approach, coupled with good judgment. Public relations, good or bad, do not come from what we say about ourselves; it comes from what we DO. We are in a "highly visible" position throughout the communities we serve.

Our goal is to provide employees with the knowledge, tools, and skills to safely and effectively deal with situations that occur on board the bus. We care about their safety and want them to obtain the confidence to be successful as a valued member of our team.

B. Student Confidentiality and Privacy

First Student employees must not disclose any information other than with school officials or their supervisor regarding a student, regardless of disability, that may be used to identify a student. This includes information about the student's mental or physical disability or condition, the characteristics that may be discussed in order to work with the student, the student's personal information, and any other information related to the student.

The Family Education Rights & Privacy Act (FERPA) is the law requiring school districts, with some exceptions, to obtain written consent prior to disclosing personally identifiable information from the students' education records. Any information regarding the student MUST be kept confidential. In January 2009, the definition of "school official" was expanded to include certain outside service providers who are acting for an educational institution and serving legitimate educational interests, such as bus drivers and attendants. This change allows us to obtain the information necessary to perform the education-related service of transportation. Be sure that all the parties involved in the discussion have a legitimate interest in the welfare of the student. Discussions should be held in private to ensure employees are not violating the student's right to privacy.

C. In-Service Safety Training

Drivers and/or attendants are responsible for attending all Mandatory In-Service Training Sessions. This training is designed to enhance the driver and/or attendant's safety knowledge and awareness, to educate and inform them of safety trends and preventative strategies, as well as any necessary changes in safety procedures. Drivers are required to attend a "make up" session if they miss in-Service Training.

EMPLOYEE HANDBOOK ACKNOWLEDGMENT

Amended, July 2022

This is to acknowledge that I have received a copy of the **First Student Employee Handbook** and understand that it contains important information on the Company's general policies and on my privileges and obligations as an employee. **I acknowledge that I am expected to read, understand, and adhere to the Company policies and will familiarize myself with the material in the Employee Handbook.**

I understand that the Company may change, rescind, add to, or interpret any polices, programs, or procedures described in the Employee Handbook from time to time at its sole and absolute discretion with or without prior notice.

I understand that employment with First Student is considered to be "At-Will" employment (except for employees covered by a Collective Bargaining Agreement or where otherwise prohibited by law). As such, I understand that my employment with the Company is not for a specified term and is at the mutual consent of myself and the Company. Accordingly, either I or the Company may terminate that employment relationship "at-will," with or without cause, at any time, with or without notice. I further understand that only the CEO of First Student has the authority to modify the at-will nature of the employment relationship and may do so only in a written agreement executed by the CEO and the employee.

If the terms and conditions of my employment are covered by a Collective Bargaining Agreement, any term or condition contained in the Collective Bargaining Agreement supersedes the terms and conditions contained in this Employee Handbook, in the event that they conflict.

I understand and acknowledge that nothing in this Employee Handbook or in any other document or policy is intended to prohibit me from reporting concerns to, filing a charge or complaint with, making lawful disclosures to, providing documents or other information to, or participating in an investigation or hearing conducted by the Equal Employment Opportunity Commission ("EEOC"), National Labor Relations Board ("NLRB"), Securities and Exchange Commission ("SEC") or any other federal, state or local agency charged with the enforcement of any laws. I also understand and acknowledge that nothing about the policies and procedures set forth in this Handbook should be construed to interfere with any employee rights provided under state or federal law, including Section 7 of the National Labor Relations Act.

Name (Please Print):	 	 	
Location:	 	 	
Position:	 	 	
Signature:	 	 	
Date:	 	 	

(This form is to be signed, removed, and included in personnel file.)

EMPLOYEE RIGHTS UNDER THE FAMILY AND MEDICAL LEAVE ACT

THE UNITED STATES DEPARTMENT OF LABOR WAGE AND HOUR DIVISION

LEAVE ENTITLEMENTS

Eligible employees who work for a covered employer can take up to 12 weeks of unpaid, job-protected leave in a 12-month period for the following reasons:

- . The birth of a child or placement of a child for adoption or foster care;
- . To bond with a child (leave must be taken within one year of the child's birth or placement);
- . To care for the employee's spouse, child, or parent who has a qualifying serious health condition;
- For the employee's own qualifying serious health condition that makes the employee unable to perform the employee's job;
- For qualifying exigencies related to the foreign deployment of a military member who is the employee's spouse, child, or parent.

An eligible employee who is a covered servicemember's spouse, child, parent, or next of kin may also take up to 26 weeks of FMLA leave in a single 12-month period to care for the servicemember with a serious injury or illness.

An employee does not need to use leave in one block. When it is medically necessary or otherwise permitted, employees may take leave intermittently or on a reduced schedule.

Employees may choose, or an employer may require, use of accrued paid leave while taking FMLA leave. If an employee substitutes accrued paid leave for FMLA leave, the employee must comply with the employer's normal paid leave policies.

BENEFITS & PROTECTIONS

While employees are on FMLA leave, employers must continue health insurance coverage as if the employees were not on leave.

Upon return from FMLA leave, most employees must be restored to the same job or one nearly identical to it with equivalent pay, benefits, and other employment terms and conditions.

An employer may not interfere with an individual's FMLA rights or retaliate against someone for using or trying to use FMLA leave, opposing any practice made unlawful by the FMLA, or being involved in any proceeding under or related to the FMLA.

ELIGIBILITY REQUIREMENTS

An employee who works for a covered employer must meet three criteria in order to be eligible for FMLA leave. The employee must:

- Have worked for the employer for at least 12 months;
- Have at least 1,250 hours of service in the 12 months before taking leave;* and
- Work at a location where the employer has at least 50 employees within 75 miles of the employee's worksite.

*Special "hours of service" requirements apply to airline flight crew employees.

REQUESTING LEAVE

Generally, employees must give 30-days' advance notice of the need for FMLA leave. If it is not possible to give 30-days' notice, an employee must notify the employer as soon as possible and, generally, follow the employer's usual procedures.

Employees do not have to share a medical diagnosis, but must provide enough information to the employer so it can determine if the leave qualifies for FMLA protection. Sufficient information could include informing an employer that the employee is or will be unable to perform his or her job functions, that a family member cannot perform daily activities, or that hospitalization or continuing medical treatment is necessary. Employees must inform the employer if the need for leave is for a reason for which FMLA leave was previously taken or certified.

Employers can require a certification or periodic recertification supporting the need for leave. If the employer determines that the certification is incomplete, it must provide a written notice indicating what additional information is required.

EMPLOYER RESPONSIBILITIES

Once an employer becomes aware that an employee's need for leave is for a reason that may qualify under the FMLA, the employer must notify the employee if he or she is eligible for FMLA leave and, if eligible, must also provide a notice of rights and responsibilities under the FMLA. If the employee is not eligible, the employer must provide a reason for ineligibility.

Employers must notify its employees if leave will be designated as FMLA leave, and if so, how much leave will be designated as FMLA leave.

ENFORCEMENT

Employees may file a complaint with the U.S. Department of Labor, Wage and Hour Division, or may bring a private lawsuit against an employer.

The FMLA does not affect any federal or state law prohibiting discrimination or supersede any state or local law or collective bargaining agreement that provides greater family or medical leave rights.



For additional information or to file a complaint:

1-866-4-USWAGE

(1-866-487-9243) TTY: 1-877-889-5627

www.dol.gov/whd

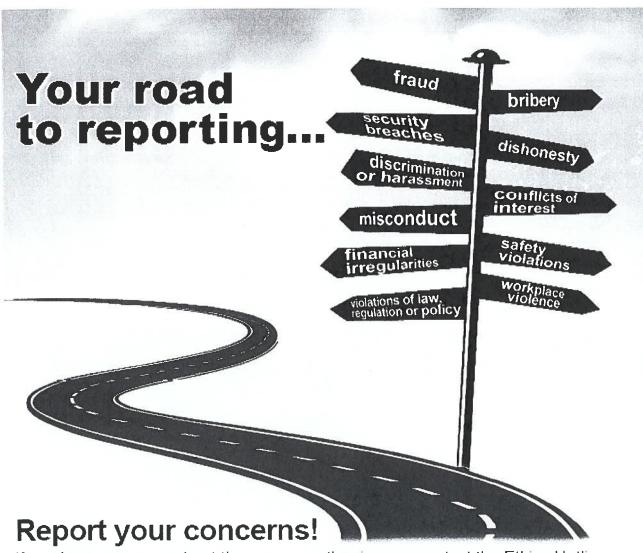
U.S. Department of Labor | Wage and Hour Division





Useful Contact Information

Medical	www.myuhc.com; 1-844-584-2266			
Dental	www.mycigna.com; 1-800-244-6224			
Vision	www.vsp.com; 1-800-877-7195			
HSA/FSA	www.myFIRSTstop.net; 1-833-277-8056			
401K	www.principal.com; 1-800-547-7754			
ADP Self-Serve	http://bit.ly/1stgrp			
EAP	www.workhealthlife.com; 1-866-695-6327			
LOAs	LOA@firstgroup.com; 1-844-362-2699			
Employment Standards	EST@firstgroup.com			
Ethics and Compliance Hotline	www.ethicsfirst.ethicspoint.com; 1-877-322-5534			
Verify Employment or Income	www.theworknumber.com; (Employer Code 12987)			



If you have concerns about these or any other issues, contact the Ethics Hotline. It's operated by an external company, not by First Student, so you can confidently report a concern and remain anonymous. The Hotline is open 24 hours a day, every day of the year.

ETHICS HOTLINE: 3 ways to report

CALL: 1-877-322-5534

VISIT: www.ethicsfirst.ethicspoint.com

EMAIL: Compliance@firstgroup.com



Take Action!

Got a QR reader? You can also report anonymously by using a smart device to scan the QR code. Visit the ethics page and file a report. Any day, Any time.

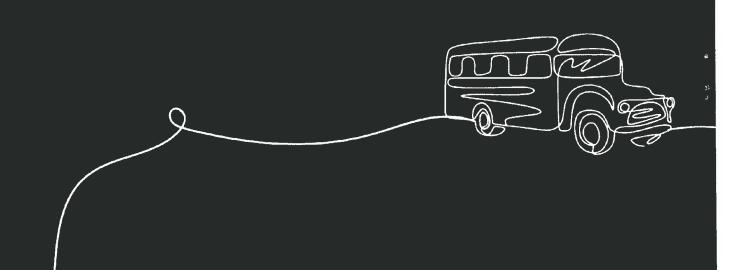


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☐ FIRSTstudent

Caring for students. That's our First priority.



Name of ProgramNHPS Head StartFor Period Beginning7/1/20242532 5278

Program Account PA 20 (Training)
Ending 4/30/2025

	Annual	YTD		Available
ltem	Budget	Expenses	Encumbrances	Budget
A. Personal				
B. Fringe Benefits				
Total Personnel	0.00	0.00	0.00	0.00
C. Mileage				
D. Travel	10,000.00	1,080.00	5,935.58	2,984.42
E. Equipment				0.00
F. Supplies				0.00
G. Contractual	0.00	0.00	0.00	0.00
H. Renovations				0.00
I. Other	46,225.00	21,970.00	0.00	24,255.00
Grand Total	56,225.00	23,050.00	5,935.58	27,239.42

 Name of Program
 NHPS Head Start

 For Period Beginning
 7/1/2024
 2532 5279

Program Account PA 22 (Basic)

Ending 4/30/2025

	Annual	YTD		Available
ltem	Budget	Expenses	Encumbrances	Budget
A. Personal	3,534,547.00	2,225,688.06	0.00	1,308,858.94
B. Fringe Benefits	1,260,837.00	655,672.81	0.00	605,164.19
Total Personnel	4,795,384.00	2,881,360.87	0.00	1,914,023.13
C. Mileage				
D. Travel	0.00	0.00	0.00	0.00
E. Equipment	10,000.00	350.57	0.00	9,649.43
F. Supplies	33,000.00	28,054.73	3,737.03	1,208.24
G. Contractual	507,709.00	311,466.09	196,242.75	0.16
H. Field Trips	18,500.00	8,346.40	9,316.00	837.60
I. Transportation	372,200.00	184,190.40	184,190.40	3,819.20
J. Other	44,358.00	23,964.16		20,393.84
Grand Total	5,781,151.00	3,437,733.22	393,486.18	1,949,931.60

 Name of Program
 NHPS Head Start

 For Period Beginning
 7/1/2024
 2532 6499

Program Account H/S Grant-One Time Ending 4/30/2025

	Annual	YTD		Available
Item	Budget	Expenses	Encumbrances	Budget
A. Personal	12,238.00	0.00	0.00	12,238.00
B. Fringe Benefits	1,019.00	0.00	0.00	1,019.00
Total Personnel	13,257.00	0.00	0.00	13,257.00
C. Mileage	0.00	0.00	0.00	0.00
D. Travel	0.00	0.00	0.00	0.00
E. Equipment	5,000.00	0.00	4,397.00	603.00
F. Supplies	64,679.00	20,611.18	25,482.70	18,585.12
G. Transportation	0.00	0.00	0.00	0.00
H. Contractual	87,720.00	0.00	87,720.00	0.00
I. Renovations	0.00	0.00		0.00
J. Other (Field Trips and Parent Activities)	0.00	0.00	0.00	0.00
Grand Total	170.656.00	20.611.18	117.599.70	32.445.12

	Annual	YTD		Available
Item	Budget	Expenses	Encumbrances	Budget
A. Personal	101,367.00	73,225.37	0.00	28,141.63
B. Fringe Benefits	29,373.00	21,187.74	0.00	8,185.26
Total Personnel	130,740.00	94,413.11	0.00	36,326.89
C. Mileage	0.00	0.00	0.00	0.00
D. Travel	0.00	0.00	0.00	0.00
E. Equipment	0.00	0.00	0.00	0.00
F. Supplies	19.00	18.39	0.00	0.61
G. Transportation	0.00	0.00	0.00	0.00
H. Contractual	0.00	0.00	0.00	0.00
I. Renovations	0.00	0.00		0.00
J. Other (Field Trips and Parent Activities)	0.00	0.00	0.00	0.00
Grand Total	130,759.00	94,431.50	0.00	36,327.50