	QC Security Plan - Terminal Level Shared (Redacted)				
	Reference No.	**RCMS**	**Creation Date**	**Revision No.**	**Revision Date**
	SAF-906-225A	YES	3/3/2008	1/16/2025	5

Purpose

Quality Carriers, Inc. (QC) and each of its subsidiaries listed on Schedule 1 attached to this policy are federally-authorized motor carriers. While each of these legal entities operates independently and makes its own determinations with respect to the subject matter covered by this policy, each of these entities has adopted this policy to govern its process. For convenience, when the term QC is used in this policy, it is in reference to the applicable subsidiary applying this policy, individually and not jointly. So, by way of example, when this policy is being applied with respect to QC Dry Bulk, LLC, any references to QC herein shall mean QC Dry Bulk, LLC.

The purpose of this Plan is to provide a redacted scope of Quality Carriers, Inc. (QC) Confidential Proprietary Security Plan for public dissemination

Parties & Accountabilities

All terminals - company or affiliate, inclusive of all operational platforms, QC and all drivers regardless of classification operating under the authority of QC.

Terms & Definitions

QC - Quality Carriers, Inc.
CTPAT – Customs Trade Partnership Against Terrorism
ELOG's - Electronic Logs
HOS - Hours of Service
SVI – Status Verification Interface
PPE – Personal Protective Equipment
OSHA – Occupational Safety & Health Administration
EPA – Environmental Protection Administration
LEO – Law Enforcement Organization/s
OJT – On Job Training
TSA - Transportation Security Administration
HAZMAT- Hazardous Materials
MVR - Motor Vehicle Report
DOT - Department Of Transportation
CCTV - Closed Circuit Television

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GPS - Global Positioning Satellites
DOS - Director of Security

Procedure/Policy

This policy has been created to ensure compliance with all State and Federal regulations relative to the safe transportation and or handling of any shipment placed in the care, custody and control of any authorized QC driver.

Redacted QC Security Plan - 49 CFR 172.800, 172.802, 172.804

Security Assessment Surveys (SAS) have been completed on all company and affiliate locations, the scope of the surveys assisted QC with formulating a comprehensive security program for our unique environment. Continued SAS's will be conducted routinely, or based on any event or elevated threat level by the DHS, as well as in conjunction with CTPAT recertification (which typically occurs on a triennial basis). An SAS may also be conducted at the discretion of QC's Vice President of Safety and Security or the Director of Security. Information contained within the QC Security Plan - SAF-906-225 is confidential, the redacted Security Plan - SAF-906-225A is for drivers operating under QC's authority as well as for public dissemination. The QC Security Plan is the property of QC's Vice President of Security and Safety and is retained in our corporate office, the plan is managed by the DOS.

The QC Security plan includes but is not limited to the following information.

- Personnel Security, comprehensive criminal background checks, employment verification, MVR query's
- Driver Security Kit including: State of the art King-Pin lock, Air Brake lock and
- Facility/customer security including but not limited to CCTV and or access control programs
- Information Technologies and Cyber Security, maintaining state of the art protection of proprietary information via electronic transmissions
- 100% ELOGS (Isaac) monitoring HOS compliance of operators and tractor locations
- Exclusive design and creation of an external pump lockout clamp which will be attached to all of our vessels to prohibit unauthorized tampering or discharge of products. The inexpensive appendage along with the other products in the QC Driver Security Kit (full

implementation pending)

- Security Assessment Surveys (SAS) are conducted for QC facilities based on area threat levels or facilities in High Threat Urban Areas (HTUA), or based on imminent threats or advisories from DHS. These SAS are only conducted for terminals that are exclusively controlled by QC
- Rigorous no parking policy which includes but is not limited to, parking on the shoulder of roadways, parking in any shopping mall, parking in any areas where large congregations of civilians are likely
- Strict prohibition towards drivers taking tankers home or parking in any venue other than authorized QC vendors, shops or customer facilities. Violators of this policy are subject to immediate disqualification
- QC senior management routinely reviews fuel receipts, drivers logs, tolls receipts as well as any other associated documents that can identify where any given laden vessel driver may be or has previously been
- As of November of 2006 QC is a fully vested CTPAT participant
- QC underwent a Corporate Security Review (CSR) in August of 2006 by the Department of Homeland Security (DHS) -Transportation Security Administration (TSA)
- QC is Free and Secure Trade (FAST) approved and is afforded the many benefits the FAST program provides
- On January 8th 2008 Quality Distribution Inc. became a Responsible Care® Partner. The Responsible Care® Security Code allows QC to routinely monitor, adjust and enhance our corporate security program. Additionally the Responsible Care® Security Code allows us to ensure unparalleled levels of protection to our nation, and to our customers within the entire supply chain, regardless of turnover at any level due to normal attrition

Driver Training Requirements - 49 CFR 172.704

Every QC driver upon successful completion of the hiring and background check processes, must also successfully complete a four day 40 hour training curriculum in one of our five schools located throughout the U.S. and Canada. Comprehensive video and classroom education is conducted along with hands-on training with QC equipment and all material is presented by QC certified Master Trainers. Recurrent training and corrective action training modules are also employed throughout a driver's tenure with QC.

This training includes but is not limited to:

- Full familiarization and overview of HAZMAT products they will be hauling
- Comprehensive on the job training with driver trainer versed on relative commodity
- Issuance of Personal Protection Equipment (PPE) and detailed instruction on usage
- QC emergency response procedures relative to but not limited to: spills, accidents, contaminations and thefts
- All drivers are fully trained on QC's Security program including but not limited to: risks associated with HAZMATs through possession and transportation, recognition and response to security related threats, customer related security requirements/plans, Law Enforcement Organization (LEO) and First Responder notifications as well as communication to QC management
- Comprehensive explanation of OSHA and EPA regulations and the impact of HAZMAT releases on our environment
- HM 126 training is conducted prior to drivers' first dispatch, as well as mandatory OJT assigned to new drivers as mandated by and documented by QC Master Trainers
- Recurrent training as required by law for all HAZMAT drivers every three years
- All records/documents relative to the driver's history and pedigree is maintained by corporate while employed by QC or approved affiliate and 90 days upon separation of employment

Regulations & References

C-TPAT
RCMS® Security Code

Appendices & Forms

N/A

Changes since last revision

Revision No.	Date	Description of changes	Revised By
1	**6/7/2017**	Reviewed….Added Boasso America throughout	B. Gacsal

		policy. Added QCER, Removed from Terms and Definitions, COI - Chemical of Interest, HHM - High Hazard Materials, HSSM - Highway Security Sensitive Materials, IS - Information Systems Revised in Parties and Accountabilities, inclusive of all operational platforms, QC, BOASSO, QCER, and all drivers regardless of classification operating under the authority of QC.Revised in Procedure/Policy, This policy has been created to ensure compliance with all State and Federal regulations relative to the safe transportation and or handling -of any shipments placed the care, custody and control of any authorized driver operating for the following operational platforms, QC, Boasso America and QCER. -Multiple revisions within Components of..and Driver Training..sections	
2	**2/24/2021**	Reviewed - Added (which typically occurs on a triennial basis) under the SAS definition	B. Gacsal
3	**8/23/2021**	Removed all references to “Quality Distribution, Inc.” and “QDI”	B. Gacsal
4	**10/9/2023**	Removed all references of C-TPAT replaced with CTPAT Rewrote section regarding SAS protocols	B. Gacsal
5	**1/16/2025**	Updated Logo	Barbra Crabtree

Document Links

N/A

SCHEDULE 1
to
Security Plan - Terminal Level Shared

Quality Carriers, Inc. subsidiaries (Carriers):

- QC Dry Bulk, LLC