

## 7.18 Company Vehicle Use

1. **Scope and Purpose:** This Policy, as will be amended from time to time, applies to all Heritage Group Corporate and Heritage Research Group employees (“Companies”). This Policy must be followed for use by anyone using Company-owned vehicles, Company-provided vehicles (i.e., pool vehicles), Company-leased vehicles, and/or personal vehicles when used for business purposes. Any such vehicle is referred to herein as a “Vehicle” and collectively as “Vehicles”.
2. **Required Driver Eligibility and Conduct:** All operators of Vehicles shall at all times:
  - a. Meet all motor vehicle report (MVR) requirements as outlined by the Companies.
  - b. Be employed by an applicable Company, whether as an employee, a contractor, a temporary employee, and/or seasonal employee; provided, however, that individuals receiving compensation by a Company for using a personal Vehicle for Company business are permitted to allow a third party who is not employed by the Company to drive such Vehicle for personal use during non-Company time.
  - c. Hold a valid and unexpired operator’s license.
  - d. Drive Vehicles in a safe manner in accordance with applicable laws and regulations.
  - e. Carry proof of insurance (either proof of Company-provided insurance or proof of insurance with respect to personal Vehicles, as applicable) in all Vehicles.
  - f. Wear safety belts and ensure that all passengers are wearing safety belts.
  - g. Operate Vehicles in accordance with their intended use (i.e., no person shall ride in the bed of a pickup truck at any time for any reason, etc.).
  - h. Use personal funds to pay any parking or traffic tickets received while operating a Vehicle.
  - i. Keep Vehicles clean and presentable, inside and out, and maintained in accordance with applicable Company policies.
  - j. Keep Vehicles free of obscene, unprofessional and/or offensive insignia, decorative or vanity plates, stickers, magnets, or other décor that would violate our Companies’ values as set forth in the Heritage Group Code of Business and Ethics.
  - k. Report business and personal mileage periodically for Company-owned or leased vehicles, as requested. The IRS value of personal mileage will be included in driver’s W-2 taxable income each year.

**Failure of any operator of a Company Vehicle to comply with the foregoing shall result in disciplinary action, up to and including termination.**

3. **Prohibited Conduct:** Each person operating a Vehicle is prohibited from engaging in the following conduct:
  - a. Knowingly and/or intentionally operating a Vehicle with a suspended or revoked operator’s license.
  - b. Operating a Vehicle while under the influence of drugs and/or alcohol, in excess of the legal limit as determined by state law.
  - c. Operating a Vehicle after having been cited for operating any Vehicle or any other vehicle while under the influence of drugs and/or alcohol.
  - d. Carrying firearms and/or other weapons in any Vehicle.
  - e. Using radar detectors and similar technology in any Vehicle.
  - f. Bypassing safety devices of any Vehicle.
  - g. Sending or reading text messages or e-mails; dialing cellular phones; viewing television, pictures, videos, or other media; and inputting data into laptop computers, personal digital assistants, or navigation systems.

h. Using a Company-owned or leased Vehicle for activities other than Company-related activities and reasonable personal errands. For example, Vehicles should not be used to: (i) supplement income (i.e., drive for Uber/Lyft/DoorDash, haul materials or perform other activities for third parties, etc.), (ii) purchase or distribute drugs or engage in any other kinds of trafficking, and/or (iii) pick up hitchhikers.

**Any operator of a Company Vehicle found to have engaged in the foregoing conduct is subject to disciplinary action, up to and including termination from the Companies. Any person using a personal vehicle for Company business is subject to the enforcement of Section 3 while using such vehicle to perform Company business or while carrying other employees in their personal vehicle. For the safety of every person, employees who observe anyone engaging in the foregoing conduct (for example, 3.b. above) are encouraged to intervene and/or report the conduct to a manager, HR, or legal counsel.**

4. **Accident Involving Vehicle:** In the event of an accident, the operator of a Vehicle must:
  - a. Call 9-1-1 for assistance. For accidents that do not require emergency services, call the non-emergency line for assistance in accident reporting. For single vehicle accidents with minor damage and no medical attention needed, police intervention for accident reporting is not required.
  - b. Assess themselves and other occupants of the Vehicle and seek medical attention as needed.
  - c. Collect insurance information of all parties involved and take photos of damage and scene of accident from all vantage points.
  - d. Report accident to management immediately, and not more than 24 hours after accident.
  
5. **Theft of Vehicle:** If an individual becomes the victim of the theft of a Vehicle, the operator must call 9-1-1 immediately to report the theft and collect a copy of any applicable law enforcement report. The operator must report theft to management as soon as possible and not more than 24 hours after theft. The Company assumes no responsibility for the loss of personal belongings kept in a Vehicle.
  
6. **Company Rights:** Using a Company Vehicle is a privilege, not an entitlement. HC+M and its officers and managers reserve the rights below, and may exercise them at any time in their full discretion:
  - a. Company Vehicles shall be assigned in accordance with guidelines established by each Company's leadership team. Company Vehicles may be assigned, re-assigned, and withdrawn by any Company in its discretion.
  - b. Individuals operating Company Vehicles are subject to regular checks of their driving records.
  - c. The Companies have the right to search or inspect any Company Vehicle at any time in order to determine compliance with this Policy. As such, there is no expectation of privacy with respect to Company Vehicles.
  - d. The Companies will deduct any penalties or fines associated with a Vehicle's license plate from the payroll check of the operator of such Vehicle.
  - e. The Companies shall terminate an operator's use of Vehicles immediately upon separation from the Companies for any reason.
  
7. **Return of Company-owned or leased Vehicles:** If Vehicle lease agreements or applicable Company policies allow, employees may use their own money to alter a Company Vehicle with after-market parts or enhancements (i.e. lift kits, towing hitch, exhausts, or under car lighting). Employees are obligated to return Vehicles in good condition, ordinary wear and tear excepted. In the event employees added any of the above-described enhancements, employees must remove such items unless such removal will negatively impact a Vehicle's trade-in or other useful value, in which case employees forfeit the enhancements and are not entitled to reimbursements for the same.

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