Visalia Transit
Public Transit Agency Safety Plan

1. Transit Agency Information

The Transit Manager is ultimately accountable for ensuring that SMS is implemented throughout Visalia Transit in accordance with this Public Transportation Agency Safety Plan (ASP). Additionally, the Transit Manager is accountable for ensuring action is taken to address substandard performance in Visalia Transit's SMS when required. The Transit Management Analyst has been designated as the Safety Officer by and reporting directly to the Transit Manager. The Transit Management Analyst has been empowered with responsibility for day-to-day implementation and operation of Visalia Transit's SMS.

Transit Agency Name	Visalia Transit – Operated by RATP Dev USA
Transit Agency Address	425 E. Oak Ave., Ste. 301 Visalia, CA 93291
Name and Title of Accountable Executive	Angelina Baker, Transit Manager
Name and Title of Chief Safety Officer	Caleb Bowman, Transit Management Analyst

Mode(s) of Service Covered by This Plan	Fixed Route Bus Service, On-Demand Bus Service, Commuter Bus Service	**List All FTA Funding Types (e.g., 5307, 5310, 5311)**	CARES, 5307, 5311(f), 5310, LCTOP, LFT

Mode(s) of Service Provided by the Transit Agency	Visalia Transit provides Fixed Route Bus Service (Visalia Transit), On-Demand Service (Dial-A-Ride & Visalia Connect), and Commuter Bus Service (V-Line) which is operated by our contractor.		
Does the agency provide transit services on behalf of another transit agency or entity?	Yes X	No	**Description of Arrangement(s)**	Visalia Transit provide fixed route public bus service for local cities and county government in the region which is operated by our contractor.

Name and Address of Agency(ies) or Entity(ies) for Which Service Is Provided	City of Exeter Attn: Jason Ridenour, City Manager jridenour@exetercityhall.com 350 W. Firebaugh Exeter, CA 93221 City of Farmersville Attn: Daymon Qualls, City Manager DQualls@cityoffarmersville-ca.gov v 909 W. Visalia Rd. Farmersville, CA 93223 Tulare County Regional Transit Agency Attn: Derek Winning, Executive Director

	DWinning@tularecag.ca.gov 200 E. Center Ave Visalia, CA 93291
Service Area	Small Urban
Census Tract Number(s)	06107001003 06107001100 06107001400

2. Contractor Information

Contractor's Name	RATP Dev USA
Operating Location Address	525 N. Cain St. Visalia, CA 93292
General Manager	Edward Van Heel
Assistant General Manager/Operations Manager	Jenny Gaitan
Safety & Training Manager	Feleicia "Danielle" Bratcher
Maintenance Manager	Joseph Olaerts

3. Plan Development, Approval, and Updates

This Agency Safety Plan addresses all applicable requirements and standards as set forth in FTA's Public Transportation Safety Program and the National Public Transportation Safety Plan.

Name of Entity That Drafted This Plan	Caleb Bowman, Transit Management Analyst, Visalia Transit	
Signature by the City's Accountable Executive	**Signature of Accountable Executive**	**Date of Signature**
	Angelina Baker, Transit Manager	
Approval by the Board of Directors or an Equivalent Authority	**City of Visalia, City Manager**	**Date of Approval**
	Leslie Caviglia, City Manager	

City Council Agenda Item Number	Meeting Date of Approval

Public Transporation Agency Safety Plan, Relevant Documentation and Location
A copy of the approved Public Transportation Agency Safety Plan and relevant documents will be maintained on the City of Visalia's Transit drive in the PTASP folder and maintained by the Transit Manager and Transit Management Analyst for City of Visalia - Transit.

Version Number and Updates

Record the complete history of successive versions of this plan.

Version Number	Section/Pages Affected	Reason for Change	Date Issued
1.0		New Document	September 2025

Annual Review and Update of the Public Transportation Agency Safety Plan

Describe the process and timeline for conducting an annual review and update of the Public Transportation Agency Safety Plan.

At Visalia Transit, review of safety practices is an ongoing process, not one limited to scheduled reviews. As policies/procedures and training techniques change throughout the year they are updated and communicated throughout the organization. All changes are reviewed and approved by Visalia's and Contractor's Accountable Executives.

Each fiscal year, Visalia Transit's Public Transportation Agency Safety Plan (PTASP) is reviewed by management and revised based on the safety data collected and analyzed, and changes to policies and procedures made throughout the year by Visalia Transit or Contractor. The final annual revision will be reviewed and approved by the Safety Committee and then by Visalia Transit's Accountable Executive (Transit Manager) by August 1st of each year. The revised PTASP will be forwarded to the City Manager for review, approval, and certification. The PTASP should be approved no later than August 20th of each year.

The Contractor's Annual Review and Update of their PTASP is included in **Attachment A, section 2.0.**

4. Annual Safety Performance Targets

Safety Performance Targets

Specify performance targets based on the safety performance measures established under the National Public Transportation Safety Plan.

Visalia Transit
Public Transit Agency Safety Plan

The targets below are based on the previous 4 years of Visalia Transit safety performance data reported to NTD.

Safety Performance Target: Major Events

The FTA NTD Policy Manual specifies reporting thresholds for minor and major safety events. Additionally, major events are considered any safety or security event that meet the threshold as outlined in **Attachment A, section 3.2**. The vehicular collision rate will include collisions with all forms of motorized vehicles (cars, buses, motorcycles, etc.).

	Fixed-Route		Commuter		Demand Response	
	FY24/25 Data	FY25/26 Targets	FY24/25 Data	FY25/26 Targets	FY24/25 Data	FY25/26 Targets
Major Events (Total)						
Major Events Rate (per 100K VRM)						
Collisions Events (Total)						
Collision Rate (per 100K VRM)						
Pedestrian Collision Events (Total)						
Pedestrian Collision Rate (per 100K VRM)						
Vehicular Collision Events (Total)						
Vehicular Collision Rate (per 100K VRM)						

Safety Performance Target: Fatalities

In accordance with the FTA NTD Policy Manual, Visalia Transit tracks the total number of overall fatalities and transit worker fatalities resulting from safety or security events, excluding those that occur because of illnesses, drug overdoses, or other natural causes (including individuals who are found deceased). Fatalities are tracked as a hard count with performance tracked monthly and cumulatively.

	Fixed-Route		Commuter		Demand Response	
	FY24/25 Data	FY25/26 Targets	FY24/25 Data	FY25/26 Targets	FY24/25 Data	FY25/26 Targets
Fatalities (Total)						
Fatality Rate (per 100K VRM)						
Transit Worker Fatality (Total)						

| Transit Worker Fatality Rate (per 100K VRM) | | | |

Safety Performance Target: Injuries

In accordance with the NTD Policy Manual, an injury is defined as an employee, passenger, or third-party experiencing harm that required immediate medical attention away from the scene because of safety event. The FTA tracks injury frequency rates (IFR) rates include employees, passengers, pedestrians, and third-party injuries and the FTA's transit worker injury rate is specific to all transit employees.

	Fixed-Route		Commuter		Demand Response	
	FY24/25 Data	FY25/26 Targets	FY24/25 Data	FY25/26 Targets	FY24/25 Data	FY25/26 Targets
Injuries (Total)						
Injury Rate (per 100K VRM)						
Transit Worker Injuries (Total)						
Transit Worker Injury Rate (per 100K VRM)						

Safety Performance Target: Assaults on Transit Workers

The overall transportation industry is experiencing a growing trend in assaults on transit workers, especially operators. The NTD Policy Manual defines a transit worker assault as a circumstance in which an individual knowingly interferes with, disables, or incapacitates a transit worker while the transit worker is performing their duties.

	Fixed-Route		Commuter		Demand Response	
	FY24/25 Data	FY25/26 Targets	FY24/25 Data	FY25/26 Targets	FY24/25 Data	FY25/26 Targets
Assaults on Transit Workers (Total)						
Rate of Assaults on Transit Workers (per 100K VRM)						

Safety Performance Target: System Reliability

In accordance with NTD Policy Manual, system reliability is measured based on the number of major mechanical failures experienced, which is defined as failure of some mechanical element of the revenue vehicle not caused by a collision, natural disaster, or vandalism, which prevent a vehicle from completing or starting a scheduled revenue trip because actual movement is limited or because of safety concerns.

	Fixed-Route		Commuter		Demand Response	
	FY24/25 Data	FY25/26 Targets	FY24/25 Data	FY25/26 Targets	FY24/25 Data	FY25/26 Targets
System Reliability (Total)						

System Reliability Rate (per 100K VRM)			
Safety Performance Target Coordination			

Every year after its formal adoption by the City Manager, the Transit Manager will share the PTASP, including safety performance targets with the State of California (Caltrans) and our Metropolitan Planning Organization, the Tulare County Association of Governments (TCAG) no later than September 1st. Department personnel will be readily available to coordinate with the State of California and TCAG in the selection of safety performance targets upon request.

5. Coordination with Metropolitan, Statewide, and Non-metropolitan Planning Processes

	State Entity Name	**Date Targets Transmitted**
Targets Transmitted to the State	**State Entity:** Caltrans Division of Rail and Mass Transportation	
	State Entity Contact which receives performance numbers: Brian Travis, Senior Transportation Planner	
	Metropolitan Planning Organization Name	**Date Targets Transmitted**
Targets Transmitted to the Metropolitan Planning Organization(s)	**MPO:** Tulare County Association of Governments	
	MPO Contact which receives performance numbers: Giancarlo Bruno, Associate Regional Planner	

6. Safety Management Policy

Safety Management Policy Statement
Include the written statement of safety management policy, incorporating safety objectives.

At Visalia Transit, safety is more than a policy statement we are committed to ensuring the safety and well-being of its employees, contractors, contractor's employees, and passengers. Management believes that working safely promotes quality, productivity, and profitability. Prevention of collisions and personal injuries is of critical importance to everyone. Management is committed to providing a safe workplace, proper training, protective equipment, and a work environment conducive to safe practices and policies as well as ensuring availability of necessary resources and people to implement SMS effectively.

It is the policy of Visalia Transit to comply with all applicable occupational safety and health regulations and to establish guidelines and procedures for the maintenance of an on-going PTASP. This is accomplished

through safety and health inspections, employee training, and accident investigation. Response to safety concerns will be given the highest priority at every level of the Visalia Transit structure.

The Contractor's Safety Management Policy Statement is included in **Attachment A, section 4.1.**

Safety Management Policy Communication

Describe how the safety management policy is communicated throughout the agency's organization. Include dates where applicable.

Local Communication of Safety Concerns

The Contractor's Safety and Training Manager (CSTM) is at the center of the safety communication process and is responsible for compiling safety reports to include the following:

- Accident and injury data
- Security incident data
- Near miss and hazard reporting
- Collision incident data
- Safety and security audit data and recommendations
- Safety Committee (SC) meeting minutes

The CSTM reports directly to the Contractor's General Manager (CGM) and routinely meets formally with the CGM, one-on-one, and Visalia Transit's Chief Safety Officer (CSO) to provide updates on safety issues, safety priorities, and hazard management. The CSTM also meets informally with the CGM and CSO to provide updates on safety issues on an as-needed basis.

Per our contract with the Contractor, the CSTM is responsible to inform the CSO of any accident, incident, or any other safety issues immediately. Reports and video are to be provided to CSO within 48 hours of the event.

The CSTM also participates in the SC meetings to discuss safety priorities, safety issues, and hazard management, and to communicate safety-related information across all departments.

The Contractor's Safety Management Policy Communication is included in **Attachment A, section 4.2.**

Authorities, Accountabilities, and Responsibilities

Describe the authorities, accountabilities, and responsibilities of the following individuals for the development and management of the transit agency's Safety Management System (SMS).

Accountable Executive	**Visalia Transit:** Angelina Baker, Transit Manager The Accountable Executives has the following authorities, accountabilities, and responsibilities under this plan: - Controls and directs human and capital resources needed to develop and maintain the ASP and SMS. - Designates an adequately trained Chief Safety Officers who are a direct report. - Ensures that the SMS is effectively implemented.

	• Ensures action is taken to address substandard performance of the SMS. • Assumes ultimate responsibility for carrying out the ASP and SMS. • Maintains responsibility for carrying out the agency's Transit Asset Management Plan.
Chief Safety Officer or SMS Executive	**Visalia Transit:** Caleb Bowman, Transit Management Analyst The Accountable Executive designates the Chief Safety Officers. The Chief Safety Officers have the following authorities, accountabilities, and responsibilities under this plan: • Develops the ASP and SMS policies and procedures. • Ensures and oversees implementation and operation of the SMS. • Manages the Employee Safety Reporting Program (ESRP). • Attends the Safety Committee Meeting • Advises the Accountable Executives on SMS progress and status. • Identifies substandard performance in the SMS and develops action plans for approval by the Accountable Executive. • Ensures that policies are consistent with the safety objectives. • Provides Safety Risk Management (SRM) expertise and support for other personnel who conduct and oversee Safety Assurance activities.
Contractor's Leadership and Executive Management	**Contractor:** Edward Van Heel, General Manager Jenny Gaitan, Assistant General Manager/Operations Manager Feleicia "Danielle" Bratcher, Safety and Training Manager Joseph Olaerts, Maintenance Manager The Contractor's Leadership and Executive Management also have authorities and responsibilities for day-to-day SMS implementation and operation of the SMS under this plan. Contractor's Leadership and Executive Management personnel have the following authorities, accountabilities, and responsibilities: • Participate as members of safety committees. • Complete training on SMS and ASP elements. • Oversee day-to-day operations of the SMS in their departments. • Modify policies in their departments consistent with implementation of the SMS, as necessary. • Chairs the Safety Committee Meeting and (Safety & Training Manager only) o Coordinates the activities of the committee;

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- Establishes and maintains the Safety Risk Register and Safety Event Log to monitor and analyze trends in hazards, occurrences, incidents, and accidents; and
- Maintains and distributes minutes of committee meetings.
- Provide subject matter expertise to support implementation of the SMS as requested by the Accountable Executives or the Chief Safety Officers, including SRM activities, investigation of safety events, development of safety risk mitigations, and monitoring of mitigation effectiveness.

The Contractor's Necessary Authorities, Accountabilities, and Responsibilities is included in **Attachment A, section 4.3.**

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Additional Accountability

AE: Visalia Transit's Accountable Executive

CSO: Visalia Transit's Chief Safety Officer

CGM: Contractor's General Manager

CAGM: Contractor's Assistant General Manager/Operations Manager

CSTM: Contractor's Safety & Training Manager

CMM: Contractor's Maintenance Manager

CHR: Contractor's Human Resources

Safety Responsibility and Task Matrix							
Responsibilities and Tasks	**AE**	**CSO**	**CGM**	**CSTM**	**CAGM**	**CMM**	**CHR**
Establish annual safety objectives for submission to the CGM and Visalia Transit at the beginning of each fiscal year	☐	☐	☐	☒	☐	☐	☐
Submit a report on the safety performance at the end of each fiscal period to CGM and Visalia Transit	☐	☐	☐	☒	☐	☐	☐
Submit the following: period operations and safety data; accident and incident reports; and site safety review results	☐	☐	☐	☒	☐	☐	☐
The CGM or their designee has the authority to direct that work or conditions have been determined to be	☒	☒	☒	☒	☒	☒	☒

	1	2	3	4	5	6	7
unsafe or pose a hazard to customers, employees, Contractor's employees, the general public, or endangers the safe passage of buses be suspended or restricted until the unsafe condition or hazard can be mitigated or corrected							
Management of system safety, occupational health and safety, accident and incident investigation, environmental protection and monitoring the implementation of the Safety Management System (SMS) Program Plan	☐	☒	☐	☒	☐	☐	☐
Review of all safety aspects of departmental procedures including Contractor's policies/instructions; Standard Operating Procedures; HR policies; safety and health policies	☒	☒	☐	☐	☐	☐	☐
SMS Review and Modification	☐	☒	☒	☐	☐	☐	☐
Safety Committee Meetings	☐	☒	☐	☒	☐	☐	☐
Daily Safety & Health Walkthrough	☐	☐	☐	☒	☐	☐	☐
Safety related reports to external agencies	☐	☒	☒	☒	☐	☐	☐
Near miss and route hazard report investigations	☐	☐	☐	☒	☐	☐	☐
Investigation of safety related trends	☐	☐	☐	☒	☐	☐	☐
Coordination with United States and State Departments of Labor and Occupational Safety and	☐	☐	☒	☐	☐	☐	☒

Health Administration (OSHA)	☐	☐	☐	☐	☐	☐	☐
Environmental Management Oversight	☐	☐	☒	☒	☐	☐	☐
Hazard Management Process	☐	☐	☒	☒	☐	☐	☐
Managing Safety Validation of Change Process	☐	☐	☒	☒	☐	☐	☐
Safety Data Reporting	☐	☐	☒	☒	☐	☐	☐
Investigations	☐	☐	☐	☒	☐	☐	☐
Advise to update SOPs, Rules, and Emergency Plans	☐	☐	☒	☒	☐	☐	☒
Emergency Response	☐	☐	☒	☒	☒	☒	☐
Fire Protection	☐	☒	☐	☐	☐	☐	☐
Shop Safety Hazardous Tools Inspections	☐	☐	☐	☐	☐	☒	☐
Review Vehicle Maintenance and Failure Data	☐	☒	☐	☐	☐	☒	☐
Perform Vehicle Maintenance Inspections/Audits	☐	☐	☐	☐	☐	☒	☐
Training, Certification, Review, and Audit	☐	☐	☐	☒	☐	☐	☐
Personal Protective Equipment Review	☐	☐	☐	☒	☐	☐	☐
Hazardous Materials Management	☐	☐	☐	☒	☐	☐	☐
Drug and Alcohol Abuse Program	☐	☐	☐	☒	☐	☐	☐
Procurement	☐	☒	☒	☐	☐	☐	☐

The Contractor's Necessary Authorities, Accountabilities, and Responsibilities is included in **Attachment A, section 4.3.**

Employee Safety Reporting Program

Describe the process and protections for employees to report safety conditions to senior management. Describe employee behaviors that may result in disciplinary action (and therefore, are excluded from protection).

Visalia Transit Management has an open-door policy for all City, contractors', and subcontractors' management and employees can communicate safety concerns without the threat of retaliation; all personal information is kept confidential to the extent possible.

The Contractor's Employee Voluntary Safety Reporting Program is included in **Attachment A, section 4.4.**

7. Safety Risk Management

Safety Risk Management Process

Describe the Safety Risk Management process, including:

- *Safety Hazard Identification: The methods or processes to identify hazards and consequences of the hazards*
- *Safety Risk Assessment: The methods or processes to assess the safety risks associated with identified safety hazards*
- *Safety Risk Mitigation: The methods or processes to identify mitigations or strategies necessary as a result of safety risk assessment*

Safety management is at the core of everything done at Visalia Transit. All employees and contractors are responsible for performing their jobs in a safe manner, which includes identifying safety risks and participating in developing and implementing effective mitigation techniques.

Safety Rist Identification

Methods or processes to identify hazards and potential consequences of the hazards.

The Contractor's Safety Risk Identification is included in **Attachment A, section 5.1.**

Safety Rist Assessment

Methods or processes to assess the safety risk associated with identified hazards.

The Contractor's Safety Risk Assessment is included in **Attachment A, section 5.2.**

Safety Rist Assessment

Methods or processes to assess the safety risk associated with identified hazards.

The Contractor's Safety Risk Mitigation is included in **Attachment A, section 5.3.**

8. Safety Assurance

Safety Performance Monitoring and Measurement

Describe activities to monitor operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended.

Visalia Transit requires the Contractor to have a resident Management Team who reports to the Chief Safety Officer. This team consists of a General Manager and a Safety Manager, who oversee the safety of the operation.

Additionally, each Contractor shall employ a Street Supervisors, Dispatchers, and Instructors; all of whom are responsible for oversight of the daily operations and training. All safety risks identified are reported to the General Manager and Safety Manager who will relay necessary information back to Visalia Transit. Any risks that can be addressed immediately are corrected but still reported. Visalia Transit's Contractor also establishes a Safety Committee (SC) that includes AE, CSO, or their designee, which uses the following methodologies to ensure a proactive approach to safety.

- Routine hazard management
- Accident and incident investigation
- Safety data collection and analysis
- Routine internal safety audits
- Facility, equipment, systems and vehicle inspections
- Routine proficiency checks for all vehicle operators and maintenance employees
- Compliance evaluations including onsite inspections
- Regularly communicating safety and hazard data to all employees

The Contractor's Safety Assurance is included in **Attachment A, section 6.1.**

Safety and Security Event Reporting and Investigation

Describe activities to conduct investigations of safety events to identify causal factors.

Visalia Transit has a "zero" tolerance for preventable injuries and collisions. Elimination of preventable injuries and collisions is our number one goal.

Any injury, collision or incident that occurs is investigated to determine preventability or non-preventability. Per our contract, The CSTM shall report any injury, collision or incident that occurs immediately to the AE and CSO. Reports and video are to be provided to CSO within 48-hours of the event. Investigations include all instances in which:

- a vehicle was damaged
- a vehicle leaves the traveled roadway
- property/structure was damaged
- a passenger is injured
- an employee is injured or
- an assault occurs aboard a bus or at a stop location

The Contractor's Safety and Security Event Reporting and Investigation is included in **Attachment A, section 6.2.**

Describe activities to monitor information reported through internal safety reporting programs.

The Contractor's Safety Manager (CSM) and/or Contractor's General Manager (CGM) routinely review all safety and hazard data, which includes searching for repetitive events that might have safety implications. When accident/incident reports and statistics indicate repetitive accidents/incidents, the CSM and CGM investigate to determine the root cause and report findings to CSO.

The Contractor's Safety and Security Event Reporting and Investigation is included in **Attachment A, section 6.2.**

Management of Change

Describe the process for identifying and assessing changes that may introduce new hazards or impact safety performance.

The Contractor's Management of Change is included in **Attachment A, section 6.3.**

Continuous Improvement

Describe the process for assessing safety performance. Describe the process for developing and carrying out plans to address identified safety deficiencies.

The Contractor's Continuous Improvement is included in **Attachment A, section 6.4.**

9. Safety Promotion

Competencies and Training

Describe the safety training program for all agency employees and contractors directly responsible for safety.

Visalia Transit requires the Contractor to implement a safety training program for all new hires in addition to regular monthly safety training for all employees. Visalia Transit Management attends at least two (2) monthly safety trainings per year.

The Contractor's Safety Competencies and Training is included in **Attachment A, section 7.2.**

Safety Communication

Describe processes and activities to communicate safety and safety performance information throughout the organization.

The Contractor's Safety Communication is included in **Attachment A, section 7.3.**

10.   Additional Information

Supporting Documentation

Include or reference documentation used to implement and carry out the Safety Plan that are not included elsewhere in this Plan.	

1. 49 CFR Part 670 Public Transportation Safety Program
2. 49 CFR Part 673 Public Transportation Agency Safety Plan
3. National Public Transportation Safety Plan (April 2024)

11.   Definitions of Special Terms Used in the Safety Plan

Visalia Transit incorporates all of FTA's definitions that are in 49 CFR § 673.5 of the Public Transportation Agency Safety Plan regulation.

Term	Definition
Accident	An Event that involves any of the following: A loss of life; a report of a serious injury to a person; a collision of public transportation vehicles; a runaway train; an evacuation for life safety reasons; or any derailment of a rail transit vehicle, at any location, at any time, whatever the cause.
Accountable Executive	A single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of a public transportation agency; responsibility for carrying out the agency's Transit Asset Management Plan; and control or direction over the human and capital resources needed to develop and maintain both the agency's Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. 5329(d), and the agency's Transit Asset Management Plan, in accordance with 49 U.S.C. 5326.
Chief Safety Officer The CSO	Has the authority and responsibility for day-to-day implementation and operation of the agency's SMS. Recipients and subrecipients to which the rule applies must have approved plans by December 31, 2020.
Equivalent Authority	An entity that carries out duties similar to that of a Board of Directors for a recipient or subrecipient of FTA funds under 49 U.S.C. Chapter 53, including sufficient authority to review and approve a recipient or subrecipient's Public Transportation Agency Safety Plan.
Event	Any Accident, Incident, or Occurrence.
Hazard	Any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.
Incident	An event that involves any of the following: a personal injury that is not a serious injury; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency.
Injury	Any harm to persons as a result of an event that requires immediate medical attention away from the scene.
Investigation	The process of determining the causal and contributing factors of an accident, incident, or hazard, for the purpose of preventing recurrence and mitigating risk.

National Public Transportation Safety Plan	The plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53.
Occurrence	An Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.
Operator	A public transportation system means a provider of public transportation as defined under 49 U.S.C. 5302.
Performance Measure	An expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets.
Performance Target	A quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the FTA.
Public Transportation Agency Safety Plan (PTASP or Agency Safety Plan)	The documented comprehensive Agency Safety Plan for a transit agency that is required by 49 U.S.C. 5329 and Part 673.
Risk	The composite of predicted severity and likelihood of the potential effect of a hazard.
Risk Mitigation	A method or methods to eliminate or reduce the effects of hazards.
Safety	Freedom from unintentional harm.
Safety Assurance	The processes within a transit agency's Safety Management System that function to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.
Safety Event	An unexpected outcome resulting in injury or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.
SMS Executive	Chief Safety Officer or equivalent that is an adequately trained individual who has responsibility for safety and reports directly to a transit agency's chief executive officer, general manager, president, or equivalent officer.
Safety Management Policy	A transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees in regard to safety.
Safety Management System	The formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards.
Safety Performance Target	A performance target related to safety management activities.
Safety Promotion	A combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system.

Safety Risk	The composite of predicted likelihood and severity of a potential consequence of a hazard.
Safety Risk Assessment	The formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.
Safety Risk Management	A process within a transit agency's Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.
Safety Risk Mitigation	A method(s) to eliminate or reduce the likelihood and severity of a potential consequence of a safety risk.
Security	Freedom from intentional harm.
Transit Agency	An operator of a public transportation system.
Transit Asset Management Plan	The strategic and systematic practice of procuring, operating, inspecting, maintaining, rehabilitating, and replacing transit capital assets to manage their performance, risks, and costs over their life cycles, for the purpose of providing safe, cost effective, and reliable public transportation, as required by 49 U.S.C. 5326 and 49 CFR Part 625.
Transit Worker	Any employee, contractor, or volunteer working on behalf of the public transit agency.

12. List of Acronyms Used in the Safety Plan

Acronym	Word or Phrase
ADA	Americans with Disabilities Act
ARC	Accident Review Committee
ASP	Agency Safety Plan
BTW	Behind-the-Wheel
CBA	Collective Bargaining Agreement
CDL	Commercial Driver's License
CEO	Chief Executive Officer
CPO	Chief People Officer
DOT	Department of Transportation
DUI	Driving Under the Influence
DWI	Driving While Intoxicated
ESC	Executive Safety Committee

EXCO	Executive Council
F.O.R.M.	First Occupational Rehabilitation Management
FTA	Federal Transit Administration
GM	General Manager
HR	Human Resources
KPI	Key Performance Indicator
LGM	General Manager
LOTO	Lock-Out/Tag-Out
LSM	Location Safety Manager
MIL-STD	Military Standard
MNT	Maintenance
OPS	Operations
OSHA	Occupational Safety & Health Administration
PPE	Personal Protective Equipment
PRM	Performance Review Management
PTASP	Public Transportation Agency Safety Plan
SM	Safety Manager
SMS	Safety Management System
SOP	Standard Operating Procedure
SRC	Safety Resource Center
SST	Safety Solutions Team
SVP	Senior Vice President
TAPTCO	Transit and Paratransit Company
UK	United Kingdom
VP	Vice President

Public Transportation Agency Safety Plan

DOCUMENT NUMBER:	RELEASE/VERSION	RELEASE/VERSION DATE:
01-SMS-GSF-002	3.0	February 10, 2025

CONTENT OWNER:

Department of Safety

RATP Dev USA

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Approvals

RATP Dev USA Public Transportation Agency Safety Plan

February, 2025

01-SMS-GSF-002

Jim Wojciechowski
Digitally signed by Jim Wojciechowski Date: 2025.02.06 20:59:00 -05'00'

Jim Wojciechowski
Senior Vice President of Safety and Industrial Engineering

Francine James
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Francine James
Vice President of Safety and Security

Ibrahima Toure
Digitally signed by Ibrahima Toure Date: 2025.02.04 16:40:05 -07'00'

Ibrahima Toure
Chief Development Officer

Debra Martinez
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Debra Martinez
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Stacy Winsett
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Bill Plisga
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Bill Plisga
Senior Vice President of Risk

Steve Sherrer
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Senior Vice President of Operations

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Matt Booterbaugh
Chief Executive Officer

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RATP Dev USA

Safety Management Policy Letter

February 2025

Dear RATP Dev USA Teammates,

Our mission is to move the country through safe, equitable, reliable, and cost-effective public transportation. Safety is a core value and to accomplish our mission we are committed to implementing a world class, industry-leading Safety Management System (SMS) that is designed to proactively manage and reduce safety risks. Simply put, we take action before accidents or injuries (known as safety and security events) have the opportunity to occur.

To continue advancing safety throughout RATP Dev USA, we are publishing a new Safety Management Policy and Public Transportation Agency Safety Plan that clearly states what "being safe" really means to us. Being safe is an intentional and disciplined level of performance that we strive to achieve every day. The key principles are:

1) We **understand our safety and security risks,** what is being done about them, and how well our actions are working.
2) We take **proactive action** to reduce safety and security risks and **prevent** safety and security events from occurring.
3) We **apply lessons learned** from our performance and make **continuous** safety and security improvements.
4) We are **encouraged and empowered to voice safety and security concerns** across all levels of the company without fear of reprisal.

By living these principles, we keep passengers, pedestrians, third parties, each other, and our assets free from harm and deliver on our promise to provide the communities we serve with safe, equitable, reliable, and cost-effective public transportation. Take a moment to reflect and renew your commitment to living our values, starting with safety.

Jim Wojciechowski
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Jim Wojciechowski
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Safety and Industrial
Engineering

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Francine James
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Stacy Winsett
Chief People Officer

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Matt Booterbaugh
Chief Executive Officer

1.0   Transit Agency Information

The CEO is ultimately accountable for ensuring that SMS is implemented throughout RATP Dev USA in accordance with this Public Transportation Agency Safety Plan (ASP). Additionally, the CEO is accountable for ensuring action is taken to address substandard performance in RATP Dev USA's SMS when required. The Senior Vice President (SVP) of Safety and Industrial Engineering has been designated as the SMS Executive by and reports directly to the CEO. The SVP of Safety and Industrial Engineering is a safety professional that has been adequately trained, holding both the U.S. Department of Transportation (DOT) Transit Safety and Security Program (TSSP) and Public Transportation Safety Certification Training Program (PTSCTP) certificates (among other credentials). The SVP of Safety and Industrial Engineering has been empowered with the responsibility for day-to-day implementation and operation of RATP Dev USA's SMS.

Transit Agency Name	RATP Dev USA		
Transit Agency Address	300 Throckmorton Street, Suite 670, Fort Worth, TX 76102		
Name and Title of Accountable Executive	Matt Booterbaugh, Chief Executive Officer at RATP Dev USA		
Name and Title of Chief Safety Officer or SMS Executive	Jim Wojciechowski, Senior Vice President of Safety and Industrial Engineering at RATP Dev USA		
Mode(s) of Service Covered by This Plan	Rail, Bus, and Paratransit	**List All FTA Funding Types (e.g., 5307, 5337, 5339)**	N/A
Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)	Directly operate and maintain bus, rail, and paratransit modes as a private contractor.		
Does the agency provide transit services on behalf of another transit agency or entity?	Yes / No X	**Description of Arrangement(s)**	RATP Dev USA operates 35 contracts throughout North America to provide fixed-route, paratransit, and rail services for transit agencies; national parks, and other entities.
Name and Address of Transit Agency(ies) or Entity(ies) for Which Service Is Provided	The full listing of our clients can be found at https://www.ratpdevusa.com/references		

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LIMITED SHARING

2.0   Plan Development, Approval, and Updates

Name of Entity That Drafted This Plan	Jim Wojciechowski, SVP of Safety and Industrial Engineering	
Signature by the Accountable Executive	**Signature of Accountable Executive**	**Date of Signature**
	Refer to Approvals (page i)	TBD
Approval by the Board of Directors or an Equivalent Authority	**Name of Individual/Entity That Approved This Plan**	**Date of Approval**
	Refer to Approvals (page i)	TBD
	Relevant Documentation (Title and Location)	
	Refer to 01-SMS-SF-001 Safety Management Policy	
Certification of Compliance	**Name of Individual/Entity That Certified This Plan**	**Date of Certification**
	RATP Dev USA self-certifies at corporate level by approving this ASP annually	N/A
	Relevant Documentation (Title and Location)	
	N/A	

Version Number and Updates			
The complete history of successive versions of this plan.			
Version Number	**Section/Pages Affected**	**Reason for Change**	**Date Issued**
1.0	New document	First version of Public Transportation Agency Safety Plan under 49 CFR Part 673.	Feb 2021
2.0	2, 3, 4, 6, 7, 12, 13, 14, 20, 25,26,28, 29, 31	2023 update	Mar 2023
3.0	Entire document	2025 update, which is a complete refresh in alignment with leadership change at the CEO and Safety levels.	Feb 2025

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Annual Review and Update of the Public Transportation Agency Safety Plan		
Timeline	**Activity or Milestone**	**Responsibility**
January 1 to December 31	ASP is made available year-round on RATP Dev USA's Safety Resource Hub for review and comment. Comments are also accepted directly through email and other means.	The VP of Safety and Security ensures the document is posted and ensures the opportunity to review and provide feedback is promoted. All comments (regardless of how they are received) will be captured and considered for incorporation as part of the annual revision cycle.
Dec 1-31	Conduct general review and draft ASP revision	The VP of Safety and Security will perform an inventory of inputs resulting from comments made, investigations, policy changes, safety action plans, and other sources. This review will include partnering with Human Resources and Operations to ensure interconnected policies, procedures, work instructions, job responsibilities (etc.) that may be affected are accounted for and addressed.
Jan 1-15	Finalize ASP draft	After the final performance data for the year has been processed, the VP of Safety and Security will finalize the ASP draft by updating the proposed safety performance targets.
Jan 15-31	Executive Council (EXCO) comment period	The proposed draft ASP revision is submitted to the EXCO for their review with feedback sent back to the VP of Safety and Security.
Feb 1-15	Finalize ASP Revision	The VP of Safety and Security ensures comments received on the proposed draft ASP revision are addressed.
Feb 16-29	EXCO review and approval period	A final review is conducted to ensure all required feedback has been addressed. The CEO and EXCO approve the ASP.
Mar 1	ASP Revision Published	The VP of Safety and Security partners with Business Development and Marketing to communicate, distribute, and promote the publishing of the latest ASP and to ensure safety training and New Employee Orientation are updated (along with other training courses, as applicable).

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3.0   Safety Performance Targets

Safety performance targets are set in alignment with the FTA's guidance as specified in the National Transportation Safety Plan. RATP Dev USA's safety performance targets are established annually and strive to achieve year-over-year improvement. Continued implementation of the SMS strategy defined in this ASP reflects how RATP Dev USA intends to meet and exceed these safety performance targets.

3.1   Safety Performance Target: Fatalities

In accordance with the FTA NTD Policy Manual, RATP Dev USA tracks the total number of overall fatalities and transit worker fatalities resulting from safety or security events, excluding those that occur because of illnesses, drug overdoses, or other natural causes (including individuals who are found deceased). RATP Dev USA's commitment is that no customer, employee, pedestrian, or any other human should ever experience a fatality because of the company's performance. Fatalities are tracked as a hard count with performance tracked monthly and cumulatively.

Metric	2024 Result	2025 Bus/PT Target	2025 Rail Target
Fatality Count	1	0	0
Fatality Rate	0.001	0.00	0.00
Formula: (Number of all fatalities x 100,000) / Monthly Total Service Mileage			
Transit Worker Fatality Count	0	0	0
Transit Worker Fatality Rate	0.00	0.00	0.00
Formula: (Number of transit worker fatalities x 100,000) / Monthly Total Service Mileage			

3.2   Safety Performance Target: Major Event Rate

The FTA NTD Policy Manual specifies reporting thresholds for minor and major safety events. Additionally, major events are considered any safety or security event that meet the threshold for Level 2 or above in RATP Dev USA's reporting matrix, which is available on the Safety Resource Hub (company's intranet). RATP Dev USA intends to reduce its major event rate by a minimum of 10% year over year with performance tracked monthly and cumulatively.

Metric	2024 Result Count	2024 Result Rate	2025 Target Count	2025 Target Rate
Major Safety or Security Events	193	0.25	174	0.22
Formula: (Number of Major Events x 100,000) / Monthly Total Service Mileage = Major Event Rate				

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3.3   Safety Performance Target: Accident Frequency Rates

The accident frequency rate (AFR) and preventable accident frequency rate (P-AFR) track the number of both major and non-major collisions experienced. A collision includes hitting fixed objects, vehicles, and any other contact that results in fatality, injury, or property damage as specified by the NTD Policy Manual. RATP Dev USA intends to reduce its AFR by a minimum of 15% and P-AFR by a minimum of 10% year over year with performance tracked monthly and cumulatively.

Metric	2024 Bus/PT Result	2025 Bus/PT Target	2024 Rail Result	2025 Rail Target
Accident Count	1870	1589	35	29
AFR	2.42	2.06	11.53	9.8
Formula: (Number of Collisions x 100,000) / Monthly Total Service Mileage = AFR				
Preventable Accident Count	773	696	11	10
P-AFR	1.00	0.90	3.63	3.29
Formula: (Number of Preventable Collisions x 100,000) / Monthly Total Service Mileage = P-AFR				

3.4   Safety Performance Target: Pedestrian Collision Rate

Pedestrian strikes are a top risk for RATP Dev USA and the transportation industry. RATP Dev USA intends to reduce its pedestrian collision rate by a minimum of 20% year over year with performance tracked monthly and cumulatively.

Metric	2024 Result Count	2025 Target Count	2024 Result Rate	2025 Target Rate
Pedestrian Collisions	14	11	0.02	0.014
Formula: (Number of Pedestrian Strikes x 100,000) / Monthly Total Service Mileage				

3.5   Safety Performance Target: Vehicular Collision Rate

The vehicular collision rate will include collisions with all forms of motorized vehicles (cars, buses, motorcycles, etc.). The KPI was introduced by the FTA in 2024. This new metric will be measured throughout the course of 2024 with trends measured month-over-month. Specific targets for year-over-year improvements will be established starting in 2025.

3.6   Safety Performance Target: Injury Frequency Rates

In accordance with the NTD Policy Manual, an injury is defined as an employee, passenger, or third-party experiencing harm that required immediate medical attention away from the scene because of safety event. RATP tracks injury frequency rates (IFR) using both the labor hours-based Occupational Safety

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and Health Administration (OSHA) methodology as well as the FTA's mileage-based methodology. RATP Dev USA intends to reduce the Occupational Safety and Health (OSH) IFR and IFR-LTI (lost time injuries) by 10%. The FTA IFR rate includes employees, passenger, pedestrian, and third-party injuries and the FTA's transit worker injury rate is specific to all transit employees. RATP Dev USA intends to reduce the FTA IFR and Transit Worker IFR by 10%.

Metric	2024 Result Count	2025 Target Count	2024 Result Rate	2025 Target Rate
OSH IFR	353	318	3.77	3.40
Formula: (Number of Employee Injuries / Total Hours Worked) x 200,000 hours				
OSH IFR-LTI	159	143	1.73	1.56
Formula: (Number of Employee Lost Time Injuries / Total Hours Worked) x 200,000 hours				
FTA IFR	666	599	0.86	0.77
Formula: (Number of all injuries x 100,000) / Monthly Total Service Mileage				
FTA Transit Worker IFR	353	318	0.46	0.41
Formula: (Number of employee injuries x 100,000) / Monthly Total Service Mileage				

3.7   Safety Performance Target: Transit Worker Assaults

The overall transportation industry is experiencing a growing trend in assaults on transit workers, especially operators. The NTD Policy Manual defines a transit worker assault as a circumstance in which an individual knowingly interferes with, disables, or incapacitates a transit worker while the transit worker is performing their duties. The KPI was introduced by the FTA in 2024. This new metric will be measured throughout the course of 2024 with trends measured month-over-month. Specific targets for year-over-year improvements will be established starting in 2025.

3.8   Safety Performance Target: System Reliability Rate

RATP Dev USA is committed to maintaining our clients' assets in a state-of-good-repair, which is foundational producing consistent, repeatable outcomes that create an environment conducive to a safe experience. In accordance with NTD Policy Manual, system reliability is measured based on the number of major mechanical failures experienced, which is defined as failure of some mechanical element of the revenue vehicle not caused by a collision, natural disaster, or vandalism, which prevent a vehicle from completing or starting a scheduled revenue trip because actual movement is limited or because of safety concerns. The system reliability rate is a new metric that will be measured throughout the course of 2024 with specific targets set for year-over-year improvements starting in 2025.

3.9   Safety Performance Target: Worker's Compensation Claims Rate

The Worker's Compensation (WC) claims rate is regarded as a safety performance KPI because when safety events occur, employees are injured and claims are filed. Therefore, a progressive reduction in claims is considered an outcome of an effective SMS. The rate is measured based on the number of

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claims per 1,000 employees. The 2024 rate of 5.7 was worse year-over-year compared to 2023 but historically low compared to performance data going back to 2020. The company will seek to achieve a new historic low in 2025 by achieving a rate of 4.9 or lower, equating to a 15% improvement.

Metric	2023 Result	2024 Result	2025 Target
WC Claims Rate	5.0	5.7	4.9

3.10   Safety Performance Target: Auto Liability Claims Rate

The Auto Liability (AL) claims rate is regarded as a safety performance KPI because when safety events occur people are injured, and property is damaged resulting in claims filed. Therefore, a progressive reduction in claims is considered an outcome of an effective SMS. The rate is measured based on the number of claims per 10,000 service miles. The 2024 rate of .14 was a significant improvement compared to 2023 (.18) but approximately flat compared to historical performance data going back to 2020. The company will seek to achieve a new historic low in 2025 by achieving a rate of .12 or lower, equating to a 15% improvement.

Metric	2023 Result	2024 Result	2025 Target
AL Claims Rate	.18	.14	.12

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4.0 Safety Management Policy

The safety management policy component of RATP Dev USA's SMS has been designed to meet the requirements established by the FTA and RATP Dev. In accordance with 49 CFR Part 673.23 *Safety Management Policy* this section of the ASP address the requirements for a safety management policy and safety management policy statement; outlines the plan for communicating the safety management policy; defines necessary organizational authorities, accountabilities, and responsibilities; describes RATP Dev USA's Employee Voluntary Safety Reporting Program; and specifies the plan forward for refreshing existing and establishing new safety related policies.

4.1 Safety Management Policy Statement

RATP Dev USA's Safety Management Policy and Safety Management Policy Statement have been included in this ASP as Appendix A and Appendix B.

4.2 Safety Management Policy Communication

RATP Dev USA's Safety Management Policy and Safety Policy Statement will be actively communicated throughout the company. A variety of communications techniques will be used to achieve this communication with the intent of reaching every employee. Upon receiving approval of by the CEO, the VP of Safety and Security will partner with Senior Director of Marketing and Communications to announce the updated policy and provide the documents to the general managers (GMs) of every location through email. The GMs will be required to print the Safety Management Policy and Safety Management Policy Statement and place them on bulletin boards, making the documents physically accessible to employees. GMs and Safety Managers (SMs) will be directed to announce the policies availability and provide an overview of the policy during their monthly safety meetings with represented employees. The VP of Safety and Security will provide a PowerPoint presentation to assist GMs and SMs with their communication and engagement. All employees will be invited to review the policy and either provide feedback directly to their management or directly to the corporate safety department through the employee voluntary safety reporting program. The Safety Management Policy will also be posted on the Safety Resource Hub, a web-based SharePoint site available through the company's intranet that serves as the centralized locations for all safety information.

4.3 Necessary Authorities, Accountabilities, and Responsibilities

The success of SMS depends on support from across the company. At a minimum, every employee at RATP Dev USA has the responsibility to report safety concerns when they are identified. This responsibility includes actively engaging in the process described in section 4.4 *Employee Voluntary Safety Reporting*. This section expands on the necessary authorities, accountabilities, and responsibilities identified in P/I 10.8 *Safety Management Policy*. The following Responsible (R), Accountable (A), Contributor (C), and Informed (I) matrix summarizes the support required from RATP Dev leadership and key staff to ensure the successful development and implementation of SMS. The ensuing sub-sections expand on the matrix to outline the specific needs identified for each position.

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Role and Title		Safety Management Policy	Safety Risk Management	Safety Assurance	Safety Promotion
Accountable Executive	Chief Executive Officer	R	R	R	R
SMS Executive	Senior Vice President of Safety and Industrial Engineering	A	A	A	A
Agency Leadership and Executive Management	Senior Vice President of Operations	A	A	A	A
	Senior Vice President of Risk	C	C	C	C
	Chief People Officer	C	C	C	C
	Chief Financial Officer	C	C	C	C
	Chief Development Officer	C	C	C	C
Key Staff	VP of Safety and Security	A	A	A	A
	Regional Safety Directors	A	A	A	A
	Regional Operations Directors	A	A	A	A
	General Managers	A	A	A	A
	Operations Managers	A	A	A	A
	Safety Managers	A	A	A	A

4.3.1   Accountable Executive

The CEO is RATP Dev USA's Accountable Executive. The CEO is ultimately responsible for RATP Dev USA's safety performance. The CEO makes policy and resource decisions, supports the implementation of safety action plans, approves safety strategic initiatives, and oversees daily operations of the company. The CEO champions safety at the company to ensure that all employees understand that safety comes first. The CEO has designated the SVP of Safety and Industrial Engineering as the SMS executive, a position that reports directly to him.

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4.3.2   SMS Executive

RATP Dev USA's SVP of Safety and Industrial Engineering has been designated as the company's SMS Executive and reports directly to the CEO. The SVP of Safety and Industrial Engineering is a safety professional that has been adequately trained, holding both the DOT TSSP and PTSCTP certificates (among other credentials). The SVP of Safety and Industrial Engineering has been empowered with the responsibility for day-to-day development and implementation of RATP Dev USA's SMS.

4.3.3   Agency Leadership and Executive Management

RATP Dev USA's Executive Council (EXCO) are the company's agency leadership and executive management. The EXCO is composed of the CEO's direct reports: SVP of Operations, SVP of Risk, SVP of Safety and Industrial Engineering, Chief People Officer, Chief Financial Officer, and Chief Development Officer. The SVP of Operations is accountable for the SMS along with the SVP of Safety and Industrial Engineering. The Operations Department is ultimately responsible for working together with the Safety Department to ensure the SMS is implemented, effective, and continuously improving. The SVP of Risk contributes to the safety strategy, provides input based on claims data, and helps set safety performance targets. The Chief People Officer contributes to the safety strategy and incorporates safety principles into the human resources program to include the employee handbook, hiring selection and onboarding processes, policy development, and employee engagement campaigns. The Chief Financial Officer contributes by collaborating with the safety department to determine their annual budget, support funding for key safety initiatives, track the safety program's financial performance in terms of negotiated insurance premiums and worker's compensation and auto liability claims cost reductions. The Chief Development Officer contributes by utilizing the communications and marketing team to help communicate safety information across the company, assists with implementing key safety strategic initiatives to include providing products and branding, and assists the safety department with logos, graphics, designs, and messaging.

4.3.4   Key Staff

The safety department includes a VP of Safety and Security and three regional safety directors. The operations department includes five operations directors. These safety and operational leaders are accountable for working together to develop and implement the company's SMS. The alignment of operations and safety on the strategy to develop and implement the SMS is foundational to the strategy's success. Collectively, safety and operations engage the field, which is compost of 35 locations that each have General Managers (GMs), Operations Managers (OMs) and Safety Managers (SMs). At the local level, the GM functions as an Accountable Executive and the SM functions as the SMS Executive. The GM manages their budget, controls human and capital resources, and they are held accountable for providing safe, quality operations for clients and the communities served. By implementing the SMS, SMs work with GMs and OMs to ensure the locations safety risks are understood, prioritized, and identifies the mitigations required to continuously improve safety performance. The GMs assign funding and resources against safety risks and OMs are responsible for working closely with SMs to apply those resources to drive safety risk mitigations, which translates into the systematic reduction in the quantity and severity of safety events and claims costs.

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4.4   Employee Voluntary Safety Reporting Program

RATP Dev USA requires all employees to identify hazards, mitigate them immediately if possible, and to report them. This includes reporting a close call when involved directly or witnessing a near-miss incident, or if a reported safety concern persists. RATP Dev USA strives for a culture where employees feel comfortable verbally reporting their safety concerns to their direct supervisor, safety management, or senior management as soon as they are discovered. However, there may be circumstances where employees prefer reporting outside their chain of command to maintain confidentiality and to avoid the potential for retaliation. RATP Dev USA's Safety Management Policy specifically prohibits retaliation, but the concern may still exist. Consequently, the company has implemented and Employee Voluntary Safety Reporting Program. Every location's SM is responsible for ensuring the Employee Voluntary Safety Reporting

Program flyer is posted. Employees can simply scan a QR code or they can email safetyreport@ratpdev.com. Employees can choose to remain confidential with identifying themselves and providing contact information optional although providing this information is encouraged. Upon receiving an employee voluntary safety report, the VP of Safety and Security reviews every report with their applicable regional safety directors. The safety directors work with their operational counterparts, GMs, and SMs to investigate the report, assess the risk, and determine the appropriate mitigation plan forward. All risk mitigations will be incorporated into each location's safety action plan. The regional safety director will coordinate to ensure the reporter receives regular updates through the review, investigation, assessment, and mitigation process. A critical component of the Employee Voluntary Safety Reporting Program is assuring the reporter their voice was heard, their reports is being actively addressed, and ultimately, what actions are being taken in response. There are conditions when a reporting employee could be subject to discipline, specifically:

- The employee's action or lack of action was intended to damage RATP Dev USA's equipment

- The employee's action or lack of action purposely places others in danger

- The employee's action or lack of action involved a criminal offense

- The employee's action or lack of action violated a traffic safety law leading to a citation

- The employee's behavior involved substance abuse

- The report contains falsified information

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5.0   Safety Risk Management

The Safety Risk Management component of RATP Dev USA's SMS has been designed to meet the requirements established by the FTA and RATP Dev. In accordance with 49 CFR Part 673.25 *Safety Risk Management*, this section of the ASP includes: safety risk identification, safety risk assessment, and safety risk mitigation (corrective and preventive actions).   The safety risk management process is the engine of RATP Dev USA's SMS, which is designed to enable proactive detection of safety risk and drive actions before a safety event has the opportunity occur. Through systematic implementation across the company, the quantity and severity of RATP Dev USA's accidents, injuries, property damage, and association claims will continue to progressively trend down even while the company continues on a consistent growth trajectory year-over-year.

5.1   Safety Risk Identification

The first step in the Safety Risk Management process is to identify safety risks (any real or potential condition that can cause injury, illness, or death; damage to or loss of facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment).   The safety risk identification approach is data-driven and therefore, RATP Dev USA collects safety data from a variety of sources that are reviewed and analyzed to identify safety risks. Safety data is categorized as either lagging indicators and leading indicators. Lagging indicator data reflects the near-misses and safety events that have occurred also known as realized risks. Leading indicator data reflects behaviors and reports that are regarded as precursors to experiencing a safety event. The following data sources have been made available to all GMs and SMs:

- Lagging indicator data sources
    - SafeTracker software captures all near-miss and safety event reports and investigations
    - Fleet Response software captures all auto liability claims data
    - Helmsman software captures all worker's compensation claims data
    - Qlik Sense Business Intelligence tool tracks trends against safety performance targets

- Leading indicator data sources
    - Telematics software captures and trends operator risky behaviors
    - Internal and external audit findings
    - Employee voluntary safety reports
    - Reports from the FTA, clients, industry, or other external entities

GMs, SM, and OMs are expected to work together to use all these data sources to detect patterns and trends that indicate systemic risks exist on an ongoing basis. The local teams have the ability to engage with their operations and safety directors on assistance in reviewing the data. The risks identified are then captured in the risk register and action planning tool, Monday.com.

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5.2   Safety Risk Assessment

The identified risks are subjected to an assessment based on the likelihood and severity formula benchmarked from MIL-STD-882E *System Safety Standard Practice*. Likelihood is measured based on the frequency (or how often risk is expected to occur). A combination of quantitative and qualitative data is used to assess likelihood. The leading and lagging indicators are considered along with existing mitigations in place, employee reporting, feedback from safety and operations management, results from safety assurance oversight, and findings from internal audits, the FTA, RATP Dev (Paris), or other entities. Determining likelihood is ultimately and exercise in interpreting data. The qualitative guideline specified in the table below is from the MIL-STD-882E criteria. The quantitative guideline is intended to help inform users interpretation based on exposure population. For example, if a particular intersection is prone to safety events, the exposure population would assess the ratio of how often a buses pass through that intersection compared to how often near-misses, safety events, or risky behaviors are detected to help determine the frequency rating.

Probability	Value	Qualitative Guideline	Quantitative Guideline
Frequent	A	Opportunity for risk to be realized expected to occur often	Probability of occurrence greater than or equal to 10^{-1} (10%) of exposure population
Probable	B	Opportunity for risk to be realized expected on a recurring basis	Probability of occurrence less than 10^{-1} (10%) but greater than or equal to 10^{-2} (1%) of exposure population
Occasional	C	Opportunity for risk to be realized expected to occur	Probability of occurrence less than 10^{-2} (1%) but greater than or equal to 10^{-3} (0.1%) of exposure population
Remote	D	Opportunity for risk to be realized not expected to occur but possible	Probability of occurrence less than 10^{-3} (0.1%) but greater than or equal to 10^{-6} (0.0001%) of exposure population
Improbable	E	Opportunity for risk to be realized not expected to occur and almost inconceivable	Probability of occurrence less than 10^{-6} (0.0001%) of exposure population

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Severity is measured based on the consequences expected from the risk occurring. A combination of quantitative and qualitative inputs is also used to assess severity. Historical safety performance indicators such as the nature of the injury experienced, extent of property damage, and length of service disruption are reviewed along with existing mitigations, employee reporting, feedback from safety and operations management, results from safety assurance oversight, and findings from internal audits, the FTA, RATP Dev (Paris), or other entities. After likelihood is assessed, the GMs and SMs assess the severity of each risk based on a discussion and interpretation of this data. The MIL-STD-882E severity scale has a number-based value range from 1 to 4. The lower the number value assigned, the more severe the consequence is expected to be as reflected in the following table.

Severity	Value	Meaning
Catastrophic	1	Risk realization expected to result in one or more of the following: death, permanent total disability, loss of passenger/crew occupied volume with equipment damage causing separations in structure, infrastructure damage that suspends service through the affected area for greater than 24 hours.
Critical	2	Risk realization expected to result in one or more of the following: permanent partial disability, injuries/illness that results in hospitalization, loss of passenger/crew occupied volume with equipment damage that causes openings but no separations in structure, infrastructure damage that suspends service through the affected area for greater than 2 and up to 24 hours.
Marginal	3	Risk realization expected to result in one or more of the following: injury or illness resulting in one or more lost work day(s), loss of passenger/crew occupied volume with equipment damage that causes no openings in structure, infrastructure damage that suspends service through the affected area for more than 30 minutes and up to 2 hours.
Negligible	4	Risk realization expected to result in one or more of the following: injury or occupational illness that does not result in a lost work day, no loss of passenger/crew occupied volume, equipment or infrastructure damage that does not suspend service nor cause a delay through the affected area for more than a maximum of 30 minutes.

The assessment of likelihood and severity of a given safety risk is based on the totality of the circumstances associated with each. Upon completing the risk assessment for each risk, the GM or SM enters the results Monday.com. The following MIL-STD-88SE risk matrix is used with grading criteria resulting in the assessment for each risk depicted as either high (red), serious (orange), medium (yellow) or low (green), determining how the safety risks will be prioritized.

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Risk Probability	Risk Severity			
	Catastrophic 1	Critical 2	Marginal 3	Negligible 4
Frequent – A	1A	2A	3A	4A
Probable – B	1B	2B	3B	4B
Occasional – C	1C	2C	3C	4C
Remote – D	1D	2D	3D	4D
Improbable – E	1E	2E	3E	4E

Risk Index		
Red	1A, 2A, 1B, 2B, 1C	Risk mitigating safety action plan required and reviewed at monthly safety meeting with SVP of Operations and SVP of Safety and Industrial Engineering
Orange	3A, 3B, 2C, 1D	Risk mitigating safety action plan required and reviewed at monthly safety meeting with SVP of Operations and SVP of Safety and Industrial Engineering
Yellow	4A, 4B, 3C, 2D, 3D, 1E, 2E, 3E	Risk mitigation safety action plan required and reviewed with regional Operation and Safety Directors.
Green	4C, 4D, 4E	Risk effectively mitigated with completed actions in place. The risk is under local GM and SM monitoring.

5.3   Safety Risk Mitigation

After the risk assessment is complete, the risk mitigation step involves determining what actions need to be taken to reduce them as low as reasonably practicable. The risks assessed as high are prioritized accordingly, followed by serious risks, then medium risks, and low risks (as required). The SMs perform research to determine whether there are risk mitigations already in place as well as any other mitigations that are already in work (e.g., as part of the safety action plan). The following criteria (based on the *Hierarchy of Controls*) is applied when developing risk mitigations:

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- Elimination: Mitigations designed into the operation that eliminate the potential for exposure to risk (e.g., *the station is shut down when an escalator malfunctions, eliminating the possibility of customers getting hurt while using them as stairs*)

- Substitution: Mitigations designed into the operation that result in avoiding the potential for risk exposure (e.g., *the station remains open when an escalator malfunctions, but customers are re-directed to actual stairs or elevators to avoid use of the malfunctioning escalator*)

- Engineering Controls: Mitigations designed into the operation that trigger controls when the potential for risk exposure increases (e.g., *an automatic gate is activated when an escalator shuts down, creating a barrier that deters customers from using them as stairs*)

- Administrative Controls: Mitigations designed to change human performance or behaviors in response to the risk (e.g., *every three minutes, the station will announce the escalator is out of service and advise customers to use the actual stairs or elevators*)

- Personal Protective Equipment (PPE): Mitigations designed to protect from exposure to the risk while an activity is performed (e.g., *an attendant will hand out helmets to customers so in case they fall while climbing a shutdown escalator, their head is protected*).

The mitigation criteria are applied with the most feasible and effective mitigations prioritized accordingly. Any risk mitigations that require additional resources (personnel, funding, etc.) are escalated to regional Safety and Operations Directors and ultimately, the SVP of Operations and SVP of Safety and Industrial Engineering as needed. After the risk mitigation actions are determined, they are incorporated into Monday.com as safety action plans. GMs and SMs are responsible for ensuring every risk mitigation is specific, measurable, achievable, relevant, and time-sensitive with clear owners assigned. GMs are responsible for ensuring that safety action plans are implemented and maintained to stay current. GMs and SMs regularly review their safety performance to determine if their safety action plan is effectively mitigating their safety risks as intended and adjust as needs dictate. An effective safety action plan results in progressively a downward trend in safety events, property damage, injuries and ultimately, translates to progressively lower worker's compensation and auto liability claims rate as well as lower expense when claims do occur. GMs are required to participate in monthly safety meetings where they report on their top safety risks, actions being taken to mitigate them, and KPIs used to measure effectiveness. These meetings provide EXCO leadership with the opportunity to review each location's implementation of the safety risk management process and provide direction.

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6.0   Safety Assurance

The Safety Assurance component of RATP Dev USA's SMS has been designed to meet the requirements established by the FTA and RATP Dev. In accordance with 49 CFR Part 673.27 *Safety Assurance*, this section of the ASP includes safety performance monitoring and measurement; safety event reporting and investigation; management of change; and continuous improvement. Additionally, the safety assurance component includes a focus on integrated claims management. If safety risk management is the engine of the SMS, safety assurance provides the fuel. The results of safety assurance are fed back into the safety risk management process, creating a systematic approach that drives continuous improvement by progressively strengthening safety actions plans.

6.1   Safety Performance Monitoring and Measurement

There are two fundamental objectives of safety performance monitoring and measurement. The first objective is to ensure that safety risk mitigations are being complied with or implemented as intended. The second objective is to measure the effectiveness of the risk mitigations to reduce the risk of having a safety event or injury as intended. To monitor compliance, each location is required to implement a variety of techniques.

6.1.1   Annual Self Assessments and Monthly Internal Controls

Each location is required to complete a self-assessment on an annual basis. The self-assessment requires each location to assess their compliance in the following control areas:

1) Commercial Driver License (CDL)
2) DOT Medical
3) Training
4) Drug and Alcohol Testing
5) Telematics (DriveCam)
6) Working Hours as defined in CBAs
7) Preventative Maintenance Inspections
8) Corrective Maintenance

In each of these areas, locations are required to rate their compliance using the following criteria:

- Rating 1 – No SOP has been established for the control area
- Rating 2 – SOP in place but internal controls (oversight) has been applied
- Rating 3 – SOP in place and internal control in place but has experienced a significant failure
- Rating 4 – SOP in place and internal control in place and working as intended

In any area where the location is reporting their maturity to be at a rating of 2 or less, they are required to work with the corporate safety department to incorporate actions into their safety action plans that will result in achieving a level 4 rating. By the 15th of every month, the managers of safety sensitive functions of each location (Operations, Dispatch, and Maintenance) are required to complete an audit internal control checklist designed to ensure that RATP dev USA is maintaining compliance in each of the control areas and proactively detecting and correcting non-compliances before they have an increase safety risk. The internal control checklists are web-based and available the following links:

- [Dispatch/Traffic Internal Control Monthly Self-Assessment](#)

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- [Maintenance Internal Control Monthly Self-Assessment](#)

- [Operations Internal Control Monthly Self-Assessment](#)

Additionally, on a quarterly basis, the location's safety managers are required to complete an internal control assessment. This safety-level internal control randomly observes and samples the operation from an objective, independent perspective that encompasses all aspects of the local organization. The internal control is due for completion by the end of each quarter on a calendar year basis with the results reported to the applicable regional safety director for review and coordination with operations regional leadership and general management. The results of all internal control activity inform the continuous improvement of safety action plans.

- [Safety Internal Control Monthly Self-Assessment](#)

6.1.2 RATP Dev Corporate Audits

Parent company RATP Dev's Technical Department comes to the United States from Paris to audit four locations annually. The scope of these audits includes operations, maintenance, safety, and support functions. The audits report on good practices taking place within the location, findings or items requiring an improvement action to ensure a risk is adequately controlled, and major findings or items requiring an immediate improvement action to ensure a significant risk is adequately controlled. The risk may be safety related or may have a significant impact on operational or financial performance. All findings are captured in RATP Dev's SmartSheet software. Each location's safety manager is required to incorporate all safety-related findings and major findings into their safety action plans in Monday.com to ensure they actions taken are tracked and managed to completion.

6.1.3 RATP Dev USA Corporate Audits and Health Check Reviews

The safety department conducts audits that include every operating contract on a triennial basis. The audits focus on training compliance, records management, and risk mitigation. The safety manager of each location is required to incorporate the findings from RATP Dev USA corporate audits into their safety action plans in Monday.com to ensure the actions taken in response are managed to completion. Additionally, the Director of Quality and Standards reports directly to the SVP of Safety and Industrial Engineering. The Director of Quality conducts 3-4 health check reviews a year as directed by the CEO. The health check reviews encompass operations, maintenance, and safety and are designed to provide recommendations to locations on how they can continuously improve their performance. However, any safety risks discovered during the health check review without mitigations in place are required to be incorporated into the location's safety action plan.

6.1.4 Telematics Oversight

All RATP Dev USA operating contracts and the majority of management contracts have a DriveCam telematics system in place. This technology tracks over 70 risky behaviors such as speeding, hard braking, following distance, incomplete stops, mobility device usage, seat belt compliance, etc. The telematics systems are installed on both revenue and non-revenue vehicles. GMs and SMs are required to use this technology to track the performance of their operators. Telematics data provides a key source of leading indicators or precursor behaviors that can be addressed before a safety event or injury occurs. Therefore, GMs and SMs are expected to coach operators on risk behaviors in a timely manner with a target of having the coaching sessions within three days of the event. GMs are expected to

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negotiate progressive discipline policies in their CBAs so that operators that are not responding to the coaching are held accountable progressively to include termination if required. Refer to the RATP Dev USA Telematics Policy for more information.

6.1.5 Qlik Sense for Performance Monitoring

RATP Dev USA's KPIs for Safety, People, Operations, and Finance are visualized using the business intelligence tool, Qlik Sense. Qlik Sense enables the GMs and their staff to monitor their progress against the established safety performance targets (refer to section 3.0 for RATP Dev USA's safety performance targets). The effectiveness of their safety action plans is assessed based on KPI performance. If the safety action plans are working as intended, then safety performance should be trending favorably month-over-month. Conversely, if safety performance is flat or trending unfavorably month-over-month, then safety action plans should be re-evaluated with new actions or refreshed priorities to ensure they are current and aligned with the evolving nature of dynamic transit operations. Ultimately, safety action plans are not considered effective until they are effective mitigating risk, which translate to downward trends in safety KPIs. These trends are tracked at the location, regional, and company level. The safety regional directors also monitor these trends, assess the quality of safety action plans, conduct site visits, and provide subject matter expertise to assist locations in continuously improving their safety actions plans.

6.1.6 Additional Performance Monitoring Best Practices

Each location is also expected to implement a variety of best practices to monitor performance and verify compliance. These best practices include road checks performed by operations supervisors. These checks involve supervisors riding the bus and observing operators comply with traffic laws, training requirements, and customer service. Another best practice includes trail checks, where supervisors in non-revenue vehicles follow revenue vehicles and monitor their performance for speed, braking, traffic law compliance, etc. Locations are encouraged to adopt a mystery rider program where anonymous riders complete a checklist or questionnaire evaluating their experience with the service. Each location implements a system of tracking findings and actions taken to address them. Systemic or recurring findings are required to be incorporated into each location's safety action plan for additional tracking, oversight, and support from the corporate safety department.

6.2   Safety and Security Event Reporting and Investigation

A safety or security event is defined as an unexpected outcome resulting in injury or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment. RATP Dev USA has established a reporting matrix that specifies the criteria for five reporting levels (0-4) based on the severity of the safety or security event experienced. All safety and security events (regardless of level) are required to be reported in RATP Dev USA's safety software SafeTracker. GMs are required to ensure all safety and security events are reported promptly. Level 0s and 1s are required to be reported with 24 hours of occurring. Level 2s are required to be reported within six hours of occurring. Level 3s are required to be reported within four hours of occurring. Level 4s are required to be reported immediately or within one hour of occurring. All Level 1-4 safety and security events are required to be investigated. After completing the initial report. The investigation is required to collect information that is used to determine causal factors, corrective and preventive actions, and enable claims management:

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- Pictures from the event scene
- Video from telematics system
- Operator statement / Witness statements (if applicable)
- Operator drug and alcohol testing results
- Supervisor report
- Police report
- Maintenance Work Orders and Purchase Orders

All the information collected as part of conducting the investigation is required to be uploaded into SafeTracker and also Fleet Response for auto liability claims. The data is essential for enable litigation defense when required and subrogating against another driver when they are at-fault. After the investigation is completed, the report should move from draft status in SafeTracker to complete. The lessons learned from all safety and security event investigations are captured in the locations safety action plan to drive continuous improvement. The GM is required to attend the company's Executive Accident Review Board (EARB) for all Level 2-4 Safety and Security Events. The EARB is a weekly meeting chaired by the CEO and includes safety and operations leadership as well as the applicable GMs and their support staff based on the events that have occurred. At the EARB, GMs are required to present on the event that occurred, the results of the investigation, and the actions being taken to effectively mitigate the risk of the same or similar event from re-occurring. All actions reported at the EARB are required to be incorporated into the location's safety action plan and managed as part of their overall effort to systematically reduce safety risks.

6.3   Management of Change

Any change to an existing transit operation has the potential to introduce safety risks. Change comes in a variety of forms to include new employees, equipment, routes, service levels, etc. RATP Dev USA will apply the safety risk management process described in section 5.0 to proactively identify, assess, and mitigate the risks introduced by change. GMs are required to work with their clients to understand the changes planned in the future. This includes service level changes to be introduced as part of the run cut process that takes place three to four times annually (depending on location) or future equipment changes as part of long-term fleet planning, or introduction of new modes such as micro-transit or on-demand services. By anticipating change, GMs and SMs have the ability to apply the safety risk management process and incorporate mitigating actions into their safety action plans proactively before the changes are implemented and associated risk has the opportunity to cause harm. Additionally, all employees are responsible for reporting safety concerns or risks associated with change. The frontline transit workers are often directly experiencing change in terms of new buses, streetcars, or other equipment, new route adjustments or frequencies, and other forms of change. These changes have the potential to introduce safety risks and all employees have a responsibility to proactively report their safety risks or concerns associated with change in an effort to proactively mitigate them.

6.4   Continuous Improvement

The systematic approach to continuous improvement includes: (1) identification of deficiencies in the company's SMS; (2) identification of deficiencies in performance against safety targets; (3) complying with any requirements established by RATP Dev, State Safety Oversight Agencies, FTA, state DOTs, or other entities; (4) mitigating safety risks based on implementing the SMS safety risk management and

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safety assurance processes. The safety assurance component of RATP Dev USA's SMS is designed specifically to achieve these objectives.

1) The company actively seeks to identify deficiencies in the company's SMS by making this ASP available to all employees for review and feedback on the Safety Resource Hub (RATP Dev USA intranet). Additionally, the company will take advantage of the FTA's offer to conduct courtesy reviews of ASPs through the Technical Assistance Center (TAC) and incorporate their feedback. The safety department leads monthly safety reviews that include every location to report on their progress on managing risks through the implementation of effective safety risk management and safety assurance processes. RATP Dev and RATP Dev USA also implement corporate level audits and health check reviews designed to proactively assess the company's SMS in action and use the results to correct any deficiencies identified.

2) The company tracks its safety performance targets using the business intelligence tool, Qlik Sense. The dashboard enables the identification of deficiencies by visualizing progress month over month for each safety performance target and specifies the direction on how performance its trending, which is highlighted in either green (downward), yellow (flat), or red (upward). GMs are required to report on their performance at monthly safety reviews and explain how the mitigations in their safety actions plans align to what the KPIs are signaling. The ultimate effectiveness of a safety action plan is determined by its impact the KPIs that measure RATP Dev USA's safety performance targets.

3) The company implements internal controls required by RATP Dev and receives corporate audits from the parent company annually. The FTA conducts triennial reviews and state DOTs conduct periodic audits as well. The company evaluates all of the findings received and assesses them using the safety risk management process described in section 5.0 and either develops a separate corrective action plan or incorporates actions into their overall safety action plan, depending on the scope and magnitude of the effort required to address the finding. All feedback from reviews and audits are considered opportunities to drive continuous improvement of the company's SMS.

4) Regardless of their safety performance, every location in RATP Dev USA is required to actively maintain and implement a safety action plan. The safety action plan is driven by the results of the safety risk management process (section 5.0), which is fueled by the results of safety assurance activities (section 6.0). The audits, reviews, KPIs, risky behaviors, lessons learned from other locations ensure that even top performing locations have a wealth of data used to inform their safety action plans and drive continuous improvement.

6.5   Integrated Claims Management

The risk and safety departments have collaborated to establish a robust tool using Monday.com to effectively manage WC claims (pictured below). The tool enables the corporate and local teams to have a clear and shared understanding of exactly how many open WC claims are open, the status of each open claim, and the next step required. The objective is to support injured employees while managing claims as efficiently as possible to closure. Additionally, the safety and risk departments are developing a tool customized to manage AL claims, which is scheduled for implementation across the company over the course of the second quarter (Q2) of 2025.

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7.0   Safety Promotion

The Safety Promotion component of RATP Dev USA's SMS has been designed to meet the requirements established by the FTA and RATP Dev. In accordance with 49 CFR Part 673.29 *Safety Promotion*, this section of the ASP includes: safety competencies and training as well as safety communication. The ultimate purpose of safety promotion is to shape and reinforce the safety culture required to ensure the long-term, sustained effectiveness of SMS. At RATP Dev USA, safety is value and the vision to achieve a safety culture where every employee has a fundamental understanding of the company's safety program and feels comfortable voicing safety concerns and reporting risks without fear of retribution.

7.1   RATP Dev USA Values

RATP Dev USA's values are Safet, United, Caring, Effective, and Daring. Safety is the first company value because the company emphasizes that safety is critical and informs every action, decision, and effort. The company is committed to maintaining a secure and healthy environment for everyone at work whether that's in the office, in a maintenance shop, or on the road. The united is value is about sharing knowledge, experiences, and ideas with each other. Especially, with approximately 40 locations across the country, RATP Dev USA's fosters a united culture that learns from one another, sharing best practices and creating a culture conducive to continuous improvement. Caring is the value that reminds us to never forget who we are working for. RATP Dev USA provides and essential community service that is there when people need us the most. The effective value is about honoring the commitment to do what we say we are going to do. Safety is essential to delivering effective, quality service that is on time, every time. The daring value is about taking on new challenges and pursuing new opportunities. RATP Dev USA seeks to be a healthy, growing business that is diversified, which can only be accomplished by establishing new relationships and taking on new challenges.

7.2   Safety Competencies and Training

RATP Dev USA's safety training program is foundational to putting the company's values into action. The training program provides courses designed for management, supervisors and functions designated as sensitive by the U.S. DOT and RATP Dev (operators, dispatchers, and mechanics). As the safety program continuously improves, the safety training program also evolves to incorporate training on trending risk areas, best practices, lessons learned, and input from external sources such as RATP Dev's Technical Department and the FTA. The safety training and safety assurance functions complement each other to ensure the training administered is being applied and working as intended. The findings from safety assurance oversight are incorporated into the safety risk management process, resulting in a continuously improving safety action plan that systematically drives training program improvements.

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7.2.1   Safety Management Training

All RATP Dev USA GMs and SMs receive instructor-led, classroom-based safety management training conducted by the safety and risk departments. The training covers the principles of RATP Dev USA's SMS (Safety Policy, Safety Risk Management, Safety Assurance, and Safety Promotion). The training course proceeds to train the GMs and SMs on how to use the tools provided to proactively manage their safety risks to continuously improve performance. Specifically, the safety management course covers:

- How to use SafeTracker, the company's software for safety and security event reporting, investigation, and data collection

- How to use Fleet Response, the company's software for managing AL claims.

- How to use TriageNow and Helsman, RATP Dev USA's tools for managing WC claims.

- How to use DriveCam telematics technology to detect and address risky behaviors.

- How to response to employee voluntary safety reports.

- How to use Qlik Sense, the company's business intelligence tool that is used for KPI tracking as well as data trending and analysis.

- How to use internal controls, audits, trail checks, mystery riders and other safety assurance oversight to proactive detect and systemically improve safety risk management

- How to use all the data from safety and security events, WC and AL claims, telematics, voluntary safety reports, and safety assurance oversight to create dynamic, data driven safety actions plans in Monday.com that reflect

  - The prioritized safety risks facing the operation

  - The actions being taken to mitigate them

  - The KPIs used to measure effectiveness

7.2.2   Operator Safety Training

RATP Dev USA safety training for new operators includes a minimum of 120 hours of training (15 days). The company combines the principles of SMS with curriculum incorporated from the Transit and Paratransit Company (TAPTCO), which is recognized as the industry standard for safety training in transit. RATP Dev classroom training includes the LLC methodology (Look Ahead, Look Around, Leave Room, Communicate), drug and alcohol training, defensive driving, customer service, sensitivity/empathy training, accident and emergency procedures, and mobility device loading and securement procedures. Training for new CDL operators includes the coursework outlined below, with a minimum of 40 additional hours of Behind-The-Wheel (BTW) training and a minimum of 40 additional hours of one-on-one training in revenue service.

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7.2.2.1   Classroom Skills Training

RATP Dev USA's training for new operators involves a detailed examination of the rules, policies, and safety procedures. Initial operator training includes a minimum 40 hours of classroom instruction, with a strong emphasis on developing the necessary skills to operate the vehicles, assist customers, understand the routes, adhere to manifests, and drive defensively. The classroom training includes:

- Operator manual, employee rulebook and uniform requirements
- Courteous and professional customer relations
- Radio communication procedures and codes; Defensive driving; safety and accident prevention

- Sensitivity training with an emphasis on working with individuals with disabilities
- Revenue vehicle types technical and safety training

Additionally, RATP Dev USA's comprehensive operator training curriculum focuses on achieving excellence in customer service. Customer service modules are included in new hire and refresher training. Customer service training is delivered using different training techniques, such as classroom training, BTW training, role-playing exercises, and verbal de-escalation training. The company's scenario-based training sessions feature the following themes:

- Winning Attitude – Operator sets the tone for being courteous and patient
- Communication Skills – Body language, tone, eye contact
- Conflict Resolution – Knowing personal / common triggers.
- Customers with Disabilities – ADA Compliance, passenger rights, and sensitivity

- Resources – Available policy and performance expectations
- A Self-evaluation Module – Evaluates one's behavior
- Customer Loyalty – Customer assistance, positive experiences, and feedback

7.2.2.2   ADA Compliance and Mobility Device Securement Training

RATP Dev USA understands that we are providing an essential service to the communities we serve and this service includes supporting the most vulnerable among us. The company takes the preparation to serve people with disabilities seriously. Operators are trained to be sensitive and patient when interacting with customers. At least eight hours of operator classroom training is spent on sensitivity training with regards to serving older adults and people with disabilities. New operator training also includes an emphasis on proper wheelchair and scooter boarding, securement, and alighting. Additionally, the training ensures that operators understand all American with Disabilities Act (ADA) laws and passenger rights.

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7.2.2.3   Behind-the-Wheel Training

RATP Dev USA's BTW training allows trainees to implement classroom lessons in a controlled operations environment, prior to in-revenue service training. Operators complete 40 hours of BTW service and must demonstrate mastery of BTW operations and procedures before they can begin the next stage of training. Examples of BTW coursework include:

- Pre-trip vehicle inspection and defect reporting
- Route and schedule or manifest adherence
- Wheelchair and scooter lifts and accessibility devices
- Application of defensive driving techniques
- Revenue vehicle type familiarization and maneuvers, including acceleration, deceleration, and turning
- Onboard equipment storage and usage

7.2.2.4   Cadet Training

Once operators have successfully completed a BTW assessment for non-revenue service training and passed a mastery test covering classroom training content, they will enter the cadet phase of training for a minimum of 40 hours. Cadet training includes the application of classroom procedures as well as BTW training. Certified senior operators who support operator training are qualified as instructors based on a safe driving record, a proven record of professional driving experience, and demonstrated ability to provide high-quality customer service.

7.2.2.5   Operator Refresher Training (Annual and Post Safety Event)

To ensure operators are prepared and continuously supported, RATP Dev creates retraining opportunities on an annual basis and as needs dictate based on performance. In mandatory annual refresher training, operators refresh their fundamental safety skills and get training on the latest advancements based on lessons learned and efforts to continuously improve. For example, refreshing training includes a review of selected customer service reports or safety and security events, which provide an opportunity to reflect and determine if the training provided was applied in each of the situations. Additionally, retaining classes will be provided for operators who have had one or more of the following occurrences in the previous 12 months:

- Preventable Accidents – Operators that had a preventable accident will receive defensive driving retraining and an onboard evaluation
- Customer Service – Operators who are charged with verified customer service complaints will receive customer service retraining
- Non-Preventable Accidents – Operators that had two non-preventable accidents will receive defensive driving retraining and an onboard evaluation
- ADA Violations – Operators who are found to violate ADA policies and procedures receive counseling, discipline, and a retraining of four hours.

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7.2.3   Road Supervisor Training

Initial training for road supervisors is a minimum of 40 hours supplemented with on-the-job training and mentoring. Supervisors are educated on all the functions of service supervision, operator management, system software, and radio communications. Road supervisors are trained in customer relations skills and operating policies to handle customer service inquiries and concerns. Supervisors are given customer service training so they can respond appropriately to customers in various situations. This training includes strategies for de-escalating situations when responding to calls for assistance with passengers. At the end of their training, supervisors are proficient in the following areas:

- Daily documentation of service operations, discrepancies, and actions

- Coach/mentor operators and dispatch to enhance service delivery

- Manage communication and escalation of concerns, safety/security events, or medical emergencies

- Monitor schedule compliance and operator performance time

- Support management and maintenance to maintain a high level of performance

- Ensure daily paperwork is complete and accurate prior to the end of shift

7.2.4   Dispatch Training

RATP Dev USA hires experienced operators or supervisors to become dispatchers. Dispatchers are responsible for coordinating the safe movement of revenue vehicles and communicate directly with operators when required. Dispatchers receive on-the-job training to include how to use dispatching software, how to manage the operation's schedule efficiently, and how to follow special instructions to support operators during road calls, emergencies, safety or security event reporting, and how to address any other issues that surface outside of standard operations.

7.2.5   Maintenance Training

RATP Dev USA has a corporate maintenance director that works with maintenance management at each location to ensure mechanics are trained to meet the needs of each location's specific fleet. This on-the-job training includes servicing and repairing vehicles, maintenance software and technology, tools and equipment, service updates and technical bulletins, and complying with safety procedures to include use of personal protective equipment. Additionally, the corporate safety department recommends that all mechanics complete OSHA 30-Hour Training (for general industry). The content of OSHA safety training includes:

- Hazard Communication (HAZCOM)

- Hazardous Materials (HAZMAT)

- Fall Protection

- Ergonomics

- Bloodborne Pathogens

- Lockout / Tagout (Electrical Safety)

- Personal Protective Equipment

- Fire Prevention and Protection

- Welding and cutting

- Machine Guarding

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7.3   Safety Communication

RATP Dev USA implements a variety of safety communication techniques to engage the workforce and shape the company's culture. The safety department issues a series of different types of safety bulletins to enhance safety knowledge, share best practices, and mandate compliance with emerging requirements when needed. The company's monthly newsletter and Blink app regularly features safety messaging, celebrates safety accomplishments, and recognizes employees for safe performance. A dedicated meeting cadence includes monthly safety meetings, monthly all-hands safety manager meetings, monthly safety meetings held locally with frontline employees, and the weekly Executive Accident Review Board (EARB) chaired by the CEO. Additionally, the safety department partners with operations and local teams to launch targets engagement campaigns and initiatives that are data driven based on safety performance trends. All this information is continuously maintained and made available on a web-based safety resource hub that provides a centralized location for processes, procedures, training materials, videos, job aids, and all other safety related materials in one place.

7.3.1   Safety Bulletins

A foundational component of RATP Dev USA's communication strategy is to engage through as series of bulletins issued by the safety department. There are three types of safety bulletins: informational, recommended, and mandatory. The informational safety bulletins contain no compliance requirements but share information such as the latest industry trends, seasonal changes, explanations of regulatory requirements, and provide guidance on SMS principles. The recommended safety bulletins share best practices, lessons learned, examples from other locations or industries but compliance with a recommendation is not required. The mandatory safety bulletins issue requirements that must be complied with by every effected location. For example, if a defective vehicle component is discovered that has the potential to cause a fire, a mandatory safety bulletin would be issued requiring a

maintenance action to remove and replace the potentially faulty component proactively on all effected vehicles. The GMs and SMs are required to post safety bulletins on the bulletin board in their employee lounges and share relevant information from safety bulletins at their monthly safety meetings. The GMs and SMs are also required to update their safety action plans with requirements that come from mandatory safety bulletins. The safety and operations directors have the responsibility for performing oversight to verify compliance with mandatory safety bulletin requirements.

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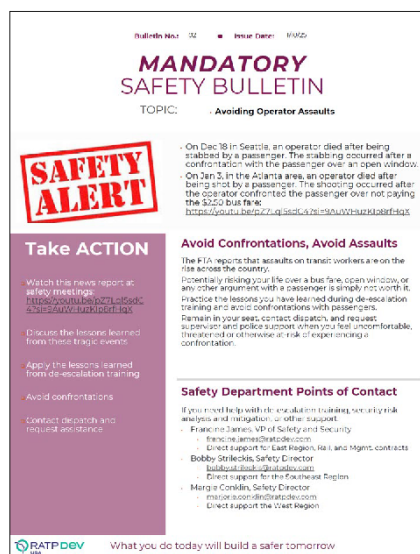
7.3.2   Focus Newsletter and Blink

The business development and marketing department publish a monthly company newsletter that highlights the great work and community engagement that takes place across the company. The safety department works closely with the business development and marketing department to ensure the newsletter consistently features safety messaging, celebrates safety accomplishments, and recognizes employees for safe performance. Additionally, the company has implemented Blink app, which is a mobile-first, all-in-one communication and collaboration platform designed specifically for engagement with front line workers. All employees can make posts, share messages, videos, alerts, and other information that directly reaches the frontline workforce and allows them to acknowledge, comment, and communicate directly through the platform.

7.3.3   Safety Meeting Cadence

The corporate safety department conducts monthly safety meetings for each region (east, southeast, west, seasonal, management/rail). At the meetings, the corporate safety department discusses any new safety bulletins that have been published, any new campaigns or initiatives, as well as other activities such as planned corporate audits, location visits, etc. At these meetings, the GMs are required to provide reports out on 1) the top safety risks facing their operation; 2) the safety action plans in place to mitigate those risks; and 3) the KPIs that measure the effectiveness of their safety risk. The reports include a discussion around what actions are working well, what other locations are doing, and where opportunities for improvement exist. The GMs work with their SMs to strengthen and continuously improve their actions plans based on the feedback. The safety department also holds a monthly all-hands safety meeting with all the SMs in the company. This safety-specific meeting is intended to engage safety managers on expectations specifically for implementing the company's SMS to include best practices, lessons learned, examples from locations across the company, and corporate feedback. As the safety program evolves, the expectations for the SMs continue to evolve and this meeting provides the forum where those expectations are communicated and discussed to achieve a shared understanding across the corporate and field levels. The EARB is a weekly meeting chaired by the CEO that reviews all the NTD major accidents (also known as Level 2s and 3s in the safety event reporting matrix). The safety department also includes significant near-misses and employee voluntary safety reports. At this meeting, the GMs are required to present the results of the investigation conducted in in detail with video, pictures, and other information and then present the actions that will be taken to effectively mitigate the underlying risk. The actions reported are then incorporated into their safety action plans in Monday.com for implementation and oversight.

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7.3.4   Targeted Safety Campaigns

The corporate safety department partners with the operations department and locations to implement targeted campaigns based on emerging trends in safety performance. For example, in 2024 an intersection safety awareness campaign was launched after a spike in pedestrian strikes revealed they were occurring at intersections. The campaign required all operators to be re-trained in the safety skills required to maneuver through intersections safely (among other actions). The campaign was successful in snapping the trend and improving safety performance. Additionally, there is a seasonality to safety performance. The timeframe from Memorial Day in May through Labor Day in September is commonly referred to as the 101 critical days of summer. Across a variety of industries safety events tend to trend higher during this period, which is attributed to an increase in distraction brought about by significant change (for example, kids being out of school, vacation being planned, adjusting to summer heat, etc.). Each year, RATP Dev USA launches a summer safety campaign designed to mitigate the effects of heat with the goal of mitigating the anticipated upward trend. A similar trend can occur after the transition to wintertime, as freezing temperatures, icy conditions, and holiday preparations create an environment conducive to elevated levels of risk and distraction that adversely affect safety performance. The GMs and SMs of each location are required to work collaboratively with corporate operational and safety leadership to implement targeted campaigns that respond to trends, seasonality, and anticipated elevation in risk levels – before safety events have the opportunity to occur.

7.3.5   Safety and Operations Resource Hubs

The safety and industrial engineering department maintains the safety resource hub, which is a SharePoint based website available on the company intranet that provides a one-stop-shop for safety bulletins, training materials, campaign information, and all other safety related information. By providing a centralized location for all safety resources, any employee can start with the safety resource hub when they are looking for the latest safety bulletin, this plan, or any other information. Additionally, the safety and industrial engineering department maintains the operations resource hub, which encompasses all the best practices, standards, and procedures covering finance, human resources, safety, management, operations, maintenance, customer service, and ethics. All the resources have been integrated into the *GM Digital Binder* providing an easily navigable tool that enables operational leaders to conduct business consistent with values and standards of RATP Dev USA.

- Internal link to the Safety Resource Hub

- Internal link to the Operations Resource Hub

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8.0   Additional Information

Supporting Documentation
49 CFR Part 670 Public Transportation Safety Program
49 CFR Part 673 Public Transportation Agency Safety Plan
National Public Transportation Safety Plan (April 2024)
RATP Dev USA Employee Handbook

8.1   Definitions of Special Terms

Term	Definition
Accountable Executive	A single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of a transit agency; responsibility for carrying out the transit agency's Transit Asset Management Plan; and control or direction over the human and capital resources needed to develop and maintain both the transit agency's Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. 5329(d), and the transit agency's Transit Asset Management Plan in accordance with 49 U.S.C. 5326.
Injury	Any harm to persons as a result of an event that requires immediate medical attention away from the scene.
Investigation	The process of determining the causal and contributing factors of a safety event, for the purpose of preventing recurrence and mitigating safety risk.
Performance Measure	An expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets.
Public Transportation Agency Safety Plan	The documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and 49 CFR Part 673.
Safety	Freedom from unintentional harm.
Safety Assurance	Processes within a transit agency's SMS that functions to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

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Safety Event	An unexpected outcome resulting in injury or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.
SMS Executive	Chief Safety Officer or equivalent that is an adequately trained individual who has responsibility for safety and reports directly to a transit agency's chief executive officer, general manager, president, or equivalent officer.
Safety Management Policy	A transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities for the management of safety.
Safety Management System	The formal, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing hazards and safety risk.
Safety Performance Target	A quantifiable level of performance or condition, expressed as a value for the measure, related to safety management activities, to be achieved within a specified time period.
Safety Promotion	A combination of training and communication of safety information to support SMS as applied to the agency's public transportation system.
Safety Risk	The composite of predicted likelihood and severity of a potential consequence of a hazard.
Safety Risk Assessment	The formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.
Safety Risk Management	A process within a transit agency's Public Transportation Agency Safety Plan for identifying, analyzing, assessing, and mitigating the safety risk of their potential consequences.
Safety Risk Mitigation	A method(s) to eliminate or reduce the likelihood and severity of a potential consequence of a safety risk.
Security	Freedom from intentional harm.
Transit Worker	Any employee, contractor, or volunteer working on behalf of the public transit agency.

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8.2   Acronyms

Acronym	Word or Phrase
ADA	Americans with Disabilities Act
ASP	Agency Safety Plan
BTW	Behind-The-Wheel
CBA	Collective Bargaining Agreement
CDL	Commercial Driver's License
CEO	Chief Executive Officer
CFO	Chief Financial Officer
CPO	Chief People Officer
DOT	Department of Transportation
EXCO	Executive Council
FTA	Federal Transit Administration
GM	General Manager
KPI	Key Performance Indicator
MIL-STD	Military Standard
OSHA	Occupational Safety and Health Administration
PPE	Personal Protective Equipment
PTASP	Public Transportation Agency Safety Plan
SM	Safety Manager
SMS	Safety Management System
SOP	Standard Operating Procedure
SVP	Senior Vice President
TAPTCO	Transit and Paratransit Company

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Appendix A – Safety Management Policy

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Title	Effective Date
Safety Management Policy	February 15, 2025
Approver	Revision Date
Matthew Booterbaugh	NEW

1) <u>Purpose</u>.

   a) The vision of RATP Dev USA is to become the transit industry leader in safety.

   b) The mission is to achieve this vision by developing and implementing a world class, industry-leading Safety Management System (SMS).

   c) The purpose of this safety management policy is to establish RATP Dev USA's commitment to the development, implementation, and continuous improvement of an integrated SMS that encompasses both operational and occupational safety requirements in accordance with:

      i) 49 CFR Part § 673 Public Transportation Agency Safety Plan

      ii) 29 CFR Part § 1910 Occupational Safety and Health Standards

      iii) RATP Dev WE SAFE Safety Policy (RDSA_SAF_Policy_Safety)

      iv) State Safety Oversight Agency (SSOA) Program Standards (for rail operations)

      v) RATP Dev USA's Public Transportation Agency Safety Plan (ASP)

2) <u>Scope</u>.

   a) This policy applies to all RATP Dev USA employees to include those working under both operating and management contracts across all modes (bus, paratransit, and rail).

3) <u>Definitions</u>.

   a) **Accountable Executive** – In accordance with 49 CFR Part § 673.23(d)(1) and 49 CFR Part § 673.5 accountable executive means a single, identifiable person who has ultimate responsibility for developing and implementing the SMS by providing control and direction over human and capital resources.

      i) At the corporate level, RATP Dev USA's accountable executive is the Chief Executive Officer (CEO).

      ii) At the location level, RATP Dev USA's accountable executives are the General Managers (GMs).

   b) **Agency Leadership and Executive Management** – In accordance with 49 CFR Part § 673.23(d)(3), agency leadership and executive management means members of RATP Dev USA's leadership team, other than the accountable executive or SMS executive, who have authorities and responsibilities for day-to-day implementation and operation of the SMS.

      i) At the corporate level, RATP Dev USA's leadership includes the Executive Council (EXCO) who are the CEO's direct reports and the Senior Leadership Team (SLT) who are director level and above.

      ii) At the location level, RATP Dev USA's leadership includes the GMs, their Assistant General Managers (AGMs), and designated key staff.

LIMITED SHARING

c) **Executive Council (EXCO)** – The EXCO is composed of the CEO's direct reports. Specifically, the Chief Financial Officer (CFO), Chief People Officer (CPO), Chief Development Officer (CDO), Senior Vice President (SVP) of Operations, SVP of Safety and Industrial Engineering, and SVP of Risk.

d) **Key Staff** – In accordance with 49 CFR Part § 673.23(d)(4), staff, groups of staff, or committees designated to support the accountable executive and SMS executive in developing, implementing, and operating SMS.

   i) At the corporate level, the CEO designates key staff in coordination with the EXCO and formally identifies them in the ASP.

   ii) At the location level, the GM designates key staff in coordination with their leadership teams, and formally identifies them in the location-specific ASP.

e) **Public Transportation Agency Safety Plan** – RATP Dev USA's plan for becoming the industry leader in safety through the development and implementation of a world class SMS.

f) **Safety Assurance** – In accordance with 49 CFR Part § 673.5, safety assurance is the third component of SMS and reflects processes within RATP Dev USA's ASP that provide oversight to verify compliance, investigation to determine root cause and corrective action, and data analysis to measure effectiveness. The results of safety assurance activities are incorporated into the safety risk management component of SMS to create a systematic loop that drives continuous improvement.

g) **Safety Culture** – An environment conducive to employees feeling encouraged and empowered to voice safety concerns across all levels of the organization to include using RATP Dev USA's voluntary employee safety reporting program without fear of reprisal.

h) **Safety Management Policy** – In accordance with 49 CFR Part § 673.5, Safety Management Policy is the first component of the SMS and formalizes RATP Dev USA's commitment to developing and implementing a world class, industry leading safety program.

i) **Safety Promotion** – In accordance with 49 CFR Part § 673.5, safety promotion is the fourth component of the SMS and reflects RATP Dev USA's training and engagement efforts to shape safety culture.

j) **Safety Risk Management** – In accordance with 49 CFR Part § 673.5, safety risk management is the second component of the SMS and reflects a process for proactively identifying, assessing, and mitigating safety risk with an emphasis on taking action before a safety event occurs.

   i) At the corporate level, the SMS executive is the Senior Vice President of Safety and Industrial Engineering.

   ii) At the location level, the SMS executive is the Safety Manager (SM) or the GM may serve in this capacity at small locations where no dedicated SM exists.

k) **SMS Executive** – In accordance with 49 CFR Part § 673.23(d)(2), the SMS executive is the Chief Safety Officer or equivalent that reports directly to and has been designated by the Accountable Executive with responsibility for day-to-day implementation and operation of the SMS.

l) **SMS** – In accordance with 49 CFR Part § 673.5, SMS is the proactive, systematic, organization-wide approach to managing safety risk and assuring the effectiveness of safety risk mitigations.

   i) At the corporate level, the safety department is responsible for leading the effort to develop and oversee implementation of RATP Dev USA's SMS as defined in the company's ASP.

   ii) At the location level, the GM is responsible for working with corporate and leading the implementation of the SMS in accordance with the company's ASP and additional requirements as applicable.

4) <u>General Policy.</u>

    a) RATP Dev USA's SMS is composed of four components:

        i) Safety Management Policy

        ii) Safety Risk Management

        iii) Safety Assurance

        iv) Safety Promotion

    b) **Safety Management Policy Requirements.** RATP Dev USA's ASP incorporates and expands upon the following requirements to comply with applicable laws, regulations, and RATP Dev requirements. Refer to ASP Section 2.0 Safety Management Policy for more information.

        i) Safety Management Policy Statement: In accordance with 49 CFR Part § 673.23(a):

            (1) At the corporate level, the CEO is responsible for signing a Safety Management Policy Statement that includes RATP Dev USA's safety objectives on an annual basis. RATP Dev USA's Safety Management Policy Statement has been included as an appendix to this policy.

            (2) At the location level, GMs are responsible for establishing and signing Safety Management Policy Statements on an annual basis and maintaining them.

            (3) All employees are responsible for knowing that safety is a top value at the company, a safety management policy is in place, the policy is accessible to them, and questions or feedback can be provided directly to their management or to corporate safety through the employee voluntary safety reporting program.

        ii) Employee Voluntary Safety Reporting Program: In accordance with 49 CFR Part § 673.23(b):

            (1) At the corporate level, the safety department is responsible for maintaining an employee voluntary safety reporting program that allows transit workers to report safety concerns, including assaults on transit workers, near-misses, and unsafe acts and conditions to senior management. The program protects transit workers who report safety conditions to senior management.

            (2) At the location level, GMs and their staff are responsible for actively promoting the employee voluntary safety reporting program, posting the information needed for employees to access and use the reporting mechanism, working with corporate to disposition reports, taking action when deemed necessary, and following up with employees to ensure they know their voices are being heard.

            (3) All employees are responsible for reporting safety risks or concerns when they are identified. Employee feedback, especially from the front line is foundational to proactive safety risk management. Employees are encouraged to report safety concerns directly to the leadership or through the employee voluntary safety reporting program.

            (4) There are conditions when a reporting employee could be subject to discipline, specifically:

                (a) The employee's action or lack of action was intended to damage RATP Dev USA's equipment

                (b) The employee's action or lack of action purposely places others in danger

                (c) The employee's action or lack of action involved a criminal offense

                (d) The employee's action or lack of action violated a traffic safety law leading to a citation

                (e) The employee's behavior involved substance abuse

                (f) The report contains falsified information

iii) Communication: In accordance with 49 CFR Part § 673.23(c):

    (1) At the corporate level, the safety department is responsible for communicating this Safety Management Policy throughout the organization using email, monthly safety meetings, and other forms of communication in an effort to reach every employee.

    (2) At the location level, GMs and their staff are responsible for communicating this Safety Management Policy at local safety meetings, posting the policy where the information is accessible to frontline employees, and using other forms of communication to reinforce the effort to reach every employee.

    (3) All employees have the responsibility to review the safety management policy, ask questions, provide feedback, and contribute to continuously improving the policy.

iv) Necessary Authorities, Accountabilities, and Responsibilities: In accordance with 49 CFR Part § 673.23(d), RATP Dev USA has established the necessary authorities, accountabilities, and responsibilities for each of the following roles in the ASP:

    (1) The CEO is the Accountable Executive at the corporate level.

    (2) The GMs are the Accountable Executives as the location level.

    (3) The SVP of Safety and Industrial Engineering is the SMS Executive at the corporate level.

    (4) The safety managers are the SMS Executives at the location level (GMs may also serve in this role at smaller locations).

    (5) The EXCO are the company's leadership and executive management at the corporate level.

    (6) The AGMs and designated staff are the company's leadership at the local level.

    (7) Key Staff are designated by the CEO at the corporate level and GMs designated key staff at the local level; these designations are captured in the ASP.

        (a) The corporate safety directors are responsible for driving implementation of this Safety Management Policy and ASP.

        (b) The corporate operations directors are responsible for overseeing implementation of this Safety Management Policy and ASP.

        (c) The corporate operations and safety directors work together to drive the successful implementation of the company's SMS.

c) **Safety Risk Management Requirements.** In accordance with 49 CFR Part § 673.25(a), RATP Dev USA describes the safety risk management process in the ASP, including the methods for conducting safety risk identification, safety risk assessment, and safety risk mitigation.

i) Safety Risk Identification: In accordance with 49 CFR Part § 673.25(b), RATP Dev USA describes the method for identification of safety risks in the ASP. The methodology includes considering the following sources for data and information used in the identification of safety risks (1) leading and lagging indicator data from safety event reporting, claims, trends in Key Performance Indicators (KPIs), (2) risky behaviors detected by telematics; (3) data and information provided by an oversight authority, including but not limited to FTA, the State, or as applicable, the State Safety Oversight Agency having jurisdiction; (4) data and information regarding exposure to infectious disease provided by the Center for Disease Control (CDC) or a State health authority; (5) results from safety assurance activities to verify compliance and measure effectiveness of operations performance; (6) employee voluntary safety reporting.

(1) At the corporate level, the safety department is responsible for developing, training, and overseeing implementation of the safety risk management standards that include risk identification through research and data driven analysis.

(2) At the location level, the GMs and SMs are responsible for meeting corporate safety risk management standards for risk identification by collecting the data, performing risk analysis, and interpreting the results to proactively identify their safety risks.

(3) All employees are responsible for promptly reporting safety risks and concerns, providing recommendations on how to mitigate risks, and following-up or escalating when needed to ensure action is taken to effectively mitigate.

ii) Safety Risk Assessment: In accordance with 49 CFR Part § 673.25(c), RATP Dev USA describes the method for assessing safety risks in the ASP. The methodology includes assessing the likelihood of realizing the safety risk and severity of the consequences with existing mitigations considered. The safety risks shall be prioritized based on the results of the assessment.

(1) At the corporate level, the safety department is responsible for developing, training, and overseeing implementation of the safety risk management standards that include performing risk assessments to prioritize identified risks in accordance with the MIL-STD-882E methodology.

(2) At the location level, the GMs and SMs are responsible for meeting corporate safety risk management standards for risk assessment by applying the MIL-STD-882E methodology resulting in prioritization of risks based on their likelihood to occur and severity of consequences.

(3) All employees should maintain for understanding the top risks facing their operation, which is based on the results of the location's safety risk assessment. Employees are responsible for engaging in a constructive dialogue about the risks, how they are mitigated, and opportunities for improvement.

iii) Safety Risk Mitigation: In accordance with 49 CFR Part § 673.25(d), RATP Dev USA describes the method for identifying the required safety risk mitigations as a result of conducting safety risk assessments to reduce the likelihood of an occurrence and severity of the potential consequences. In addition to risk assessments, the company considers the following sources for risk mitigation: (1) guidance provided by oversight authorities to include the FTA and RATP Dev; (2) guidelines to prevent or control exposure to infectious diseases provided by the CDC or a State health authority.

(1) At the corporate level, the safety department is responsible for developing, training, and overseeing implementation of the safety risk management standards that include developing mitigations that proactively reduce safety risks, resulting in the systematic reduction of safety events and claims.

(2) At the location level, the GMs and SMs are responsible for meeting corporate safety risk management standards for risk mitigation by applying developing and implementing safety action plans that are specific, measurable, achievable, relevant, and time sensitive. The safety action plans must be continuously maintained with actions, completion dates, and personnel assigned to stay current with the constantly changing risk exposure associated with dynamic transit operations.

(3) All employees are responsible for complying with actions designed to mitigate risk. Continuously improving safety performance is an inherent responsibility of all transit workers. Employees are responsible for providing feedback on how well risk mitigations are working and recommend ways to improve them and propose additional or alternative mitigations.

d) **Safety Assurance Requirements.** In accordance with 49 CFR Part § 673.27(a), RATP Dev USA describes the safety assurance process in the ASP to include safety performance monitoring and measurement, safety event reporting and investigation, management of change, and continuous improvement.

i) Safety Performance Monitoring: In accordance with 49 CFR Part § 673.27(b), RATP Dev USA describes the methods of safety performance monitoring in the ASP. The monitoring is designed to assure compliance with, and effectiveness of: (1) operations and maintenance standard operating procedures; (2) safety risk mitigations as reflected in safety action plans; (3) information reported through the employee voluntary safety reporting program; (4) KPIs to identify trends that inform proactive risk mitigations.

(1) At the corporate level, the safety department is responsible for developing, training, and overseeing implementation of safety assurance standards for safety performance monitoring. This includes providing templates for standard operating procedures, overseeing safety action plans, reviewing the quality of safety investigations, engaging locations on employee voluntary safety reports to achieve effective resolution, and providing tools to visualize KPIs.

(2) At the location level, the GMs and SMs are responsible for meeting corporate safety assurance standards for safety performance monitoring by maintaining standard operating procedures; implementing effective safety action plans; conducting thorough investigations into safety events; working with the corporate safety department to address employee voluntary safety reports; and monitoring and acting on trends detected in KPIs.

(3) Employees are responsible for understanding their safety performance, which can come from telematics systems, coaching, passenger feedback, and other sources. Employees are responsible for working with oversight activities, understanding the results, providing feedback, and making adjustments based on the lessons learned.

ii) Safety/Security Event Reporting and Investigation: A safety or security event means an unexpected outcome resulting in injury or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.

(1) At the corporate level, the safety department is responsible for maintaining the incident notification matrix that specifies reporting requirements based on the nature and severity of the safety or security event. The safety department facilitates partners with field on ensure investigations are performed thoroughly with a focus on causal factors and corrective and preventive actions that will effectively mitigate the risk of recurrence. The safety department facilitates the Executive Accident Review Board (EARB) designed to ensure high-severity safety or security events (as defined by the notification matrix) have visibility at CEO and SVP levels with ability to provide leadership direction to further drive thorough investigations and effective action planning.

(2) At the location level, the GMs are responsible for promptly reporting safety or security events. Specifically, any security or safety event at Level 2 or above in the notification matrix shall be reported to the GMs corresponding operations director within four hours of becoming aware of the event. The event must be reported in RATP Dev's safety software within the same time period. GMs are responsible for working with the safety department, operations department, and their staff to ensure thorough investigations are conducted that focus on underlying causal factors and lessons learned, which are used to inform robust corrective and preventive actions that are incorporated into the locations safety action plan. GMs are required to present their safety or security events, investigation findings, and planned actions at EARBs.

(3) All employees are responsible for cooperating fully with safety reporting and investigation requirements. This responsibility includes promptly reporting safety or security events when they

occur, providing detailed statements, completing drug and alcohol testing when required, and providing any additional information that can help effectively mitigate the risk of a recurrence.

iii) Management of Change: In accordance with 49 CFR Part § 673.27(c), RATP Dev USA describes how change is managed in the ASP to include identifying and assessing changes that may introduce risk to safety performance. The safety risk management process shall be used to evaluate how a change may impact safety performance and determine how those risks are managed.

(1) At the corporate level, the safety department is responsible for developing, training, and overseeing implementation of the safety assurance standards for change management. This includes guidance on how to apply the safety risk management approach to identify, assess, and mitigate the risk(s) introduced by change, which comes in a variety of forms such as new equipment, new personnel, new routes or service levels, etc.

(2) At the location level, the GMs and SMs are responsible for meeting corporate safety assurance standards for change management by working with safety department to proactively identify changes coming to the operation and applying the safety risk management approach to identify, assess, and mitigate the risk(s) resulting from the changes being introduced.

(3) All employees are responsible for reporting safety concerns or risks associated with change. The frontline transit workers are often experiencing change in terms of new buses, streetcars, or other equipment, new route adjustments or frequencies, and other forms of change. These changes have the potential to introduce risk and all employees have a responsibility to proactively report their safety risks or concerns associated with change in an effort to proactively mitigate them.

iv) Continuous Improvement: In accordance with 49 CFR Part § 673.27(d), RATP Dev USA describes its method of continuous improvement in the ASP to include a process for assessing safety performance and under the direction of the CEO. The systematic approach to continuous improvement includes: (1) identification of deficiencies in the company's SMS; (2) identification of deficiencies in performance against safety targets; (3) complying with any requirements established by RATP Dev, State Safety Oversight Agencies, FTA, state DOTs, or other entities; (4) mitigating safety risks based on implementing the SMS safety risk management and safety assurance processes.

(1) At the corporate level, the safety department is responsible for developing, training, and overseeing implementation of the safety assurance standards for continuous improvement. This includes conducting audits of training programs, supporting FTA triennial audits, facilitating RATP Dev corporate audits, requiring mitigations that target company-wide systemic risks, and implementing additional initiatives that are designed to strengthen the company's SMS.

(2) At the location level, the GMs and SMs are responsible for meeting corporate safety assurance standards for continuous improvement by preparing for and supporting RATP Dev USA audits, RATP Dev corporate audits, FTA triennial audits, implementing companywide risk mitigations, and implementing additional companywide initiatives that are designed to strengthen the company's SMS. GMs and SMs are responsible for ensuring all findings resulting from audits are incorporated into safety action plans and effectively resolved.

(3) There is always room for improvement and often, frontline transit workers know these opportunities better than anyone. All employees have a responsibility to communicate opportunities to improve safety by either reporting them directly to their management or using the employee voluntary safety reporting program.

e) **Safety Promotion Requirements.** RATP Dev USA's ASP incorporates and expands upon the following requirements in an effort to cultivate a safety culture that is foundational to the development and implementation of an industry-leading, world class safety program.

   i) Competencies and Training: In accordance with 49 CFR Part § 673.29(a), RATP Dev USA describes its safety training program for those directly responsible for safety in the ASP. For the frontline workforce, The RATP Dev USA certified instructor program incorporates the Transit and Paratransit Company (TAPTCO) industry standard. For location managers, the safety management training program incorporates SMS principles and best practices to include use of internal processes and tools that enable effective implementation. The safety training program shall be continuously improved in alignment with the development and implementation of the SMS.

      (1) At the corporate level, the safety department is responsible for developing and facilitating the implementation of training standards as described in the ASP.

      (2) At the location level, GMs, SMs, as well as operations and training managers (where applicable) are responsible for meeting corporate training standards by implementing processes, investing resources, and managing their employees to ensure compliance with all training requirements. GMs and SMs are responsible for ensuring that employee and training records are maintained, managed, and retrievable.

      (3) All employees are responsible for completing their training requirements. This responsibility includes knowing that your training records are on file, current, and complete. Management and employees have joint responsibility for ensuring that all training requirements are met and that employee records properly reflect training completion and currency.

   ii) Safety Communication: In accordance with 49 CFR Part § 673.29(b), RATP Dev USA describes how safety performance information is communicated throughout the company in the ASP. The communication and engagement approach includes a safety meeting cadence, mandatory and informational safety bulletins, a safety resource hub, field visits, a safety bulletin board, and employee recognition. Transit workers are informed of the safety risks relevant to their roles and responsibilities and the mitigations (actions being taken) at monthly safety meetings, posts on bulletin boards, coaching sessions, and other forms of communication and engagement.

      (1) At the corporate level, the safety department is responsible for conducting monthly safety meetings, issuing safety bulletins, maintaining the safety resource hub, managing the employee voluntary safety reporting program, conducting field visits, facilitating the executive accident review board, and continuously engaging to ensure RATP Dev USA's safety program reaches every employee.

      (2) At the location level, GMs and SMs are responsible for holding safety meetings with the frontline workforce, disseminating and complying with safety bulletin requirements, addressing employee voluntary safety reports, participating in the executive accident review board, and developing creative ways to engage the workforce to ensure the safety program reaches every employee.

      (3) All employees are responsible for knowing where they can access the latest safety information whether online or physically. Employees are responsible for knowing they have a voice and have the ability to use it either by communicating directly with their management or using the voluntary employee safety reporting program. Employees are responsible for actively participating in their locations safety meeting cadence, complying with training requirements, safety campaigns, and related activities designed to continuously improve safety performance.

Appendix B – Safety Management Policy Statement

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Safety Management Policy Statement

RATP Dev USA

Corporate

In support of RATP Dev USA's vision of being the transportation industry leader in safety and the company's Public Transportation Agency Safety Plan (PTASP), as the quality choice in public transportation, we are committed to continuously improving our safety performance through the development and implementation of a world class, robust Safety Management System (SMS).

COMMITMENT TO SAFETY MANAGEMENT SYSTEM

RATP Dev USA is committed to developing and delivering high quality transit systems, while operating in a manner that continuously improves the operational safety of our services and occupational safety for our employees. RATP Dev USA is committed to the implementation and continuous improvement of an effective SMS aligned with applicable regulatory standards and requirements. Successful implementation of a robust SMS reflects the following outcomes:

- We (all employees) are encouraged and empowered to voice safety and security concerns without fear of reprisal
- We take proactive action in response to safety risks to prevent injuries and safety/security events from occurring
- We know if our actions are working by measuring their effectiveness and we make adjustments when needed
- We apply lessons learned from our safety performance to drive continuous improvement

RATP Dev USA will provide the necessary financial and human resources to develop, implement, and oversee the SMS. Be establishing an industry leading, world class SMS, RATP Dev USA will systematically integrate proactive safety risk reduction practices into operations management that encompass service delivery, rolling stock and facility maintenance, and support services to continuously advance toward achieving the stated outcomes.

2025 RATP DEV USA SAFETY PERFORMANCE TARGETS

- Fatalities: The target is always zero
- Major Event Rate: Reduce Level 2/3 events by at least 10%
- Preventable AFR (P-AFR) – Reduce preventable safety and security events by at least 10%
- Injury Frequency Rate for Loss Time Injuries (IFR-LTI) – Reduce LTIs by at least 10%

0 – Fatalities Target
0.22 – Major Event Rate Target
0.90 – P-AFR Target
1.56 – IFR-LTI Target
0.014 – Pedestrian Collision Rate

2025 RATP DEV USA SAFETY OBJECTIVES

- Refresh RATP Dev USA's Public Transportation Agency Safety Plan
- Expand RATP Dev USA's Safety Key Performance Indicators
- Introduce company standards for Safety Risk Management and Safety Assurance
- Continuously improve Safety Action Plans
- Implement the Employee Voluntary Safety Reporting Program
- Incorporate the latest telematics capability and other safety technologies
- Complete rollout of the claims management process for worker's comp and auto liability
- Centralize and digitize recordkeeping
- Provide safety training for managers and frontline transit workers
- Perform internal audits, support RATP Dev and FTA Triennial audits to drive compliance and improvement

SAFETY STARTS WITH ME

ALL Managers have the responsibility to ensure that safe work conditions are maintained in their assigned work areas for all employees, clients, visitors, and contractors in accordance with regulatory, contractual, CBA, and company requirements.
ALL Employees shall perform their jobs safely in accordance with regulatory, contractual, CBA, and company requirements. Employees shall promptly report safety risks to their supervision or through the voluntary safety reporting program.

Matt Booterbaugh – Chief Executive Officer
Date: February 2025

Matthew Booterbaugh
Digitally signed by Matthew Booterbaugh
Date: 2025.02.03
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