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A Message from DJ Stadtler

Dear Co-workers:

INTRODUCTION

The safety of our passengers, our employees, the public and our operating environment is our highest priority. Our ultimate goal is to achieve zero injuries in our workplaces, and we can only begin to achieve this goal when each of us maintains an ongoing accountability for the safety of our environment, our work, and our fellow employees.

We have rules, standards and procedures that guide our work for a good reason—they are designed to assist in providing for a safe workplace and in preventing accidents and injuries. When employees lose a sense of the importance of these things, or worse, choose to ignore them, the consequences can be very serious.

We can only improve our safety performance when we begin to insist upon operational excellence through the observation of the rules, standards and procedures that are designed to make sure that we work safely and that each of us goes home in the same condition in which we came to work, every day.

INTRODUCTION OF CARDINAL RULES

Our Executive Safety Council has studied existing rules and practices and has identified 10 safety actions and behaviors, or “Cardinal Rules,” that are essential to maintaining individual and workplace safety. These 10 Cardinal Rules, for which we are already held accountable, will be strictly enforced as of March 15, are designed to set clear expectations, are to be unconditionally honored, and apply to everyone, every day —agreement and non-agreement employees alike. They are designed to help us maintain the kind of safe work environment that we all deserve, and our families, our passengers, and the public expect.

Any incident involving an alleged violation of any one of these Cardinal Rules will be immediately and thoroughly investigated. If found, any violation of a Cardinal Rule will be handled with zero tolerance, and shall be a basis for discipline, up to and including dismissal. Given the importance assigned to these Rules, termination is likely.

REPORTING OBLIGATIONS

It is **every** employee’s obligation to report a violation of a Cardinal Rule to his or her supervisor, whether you have committed it, or you have seen a co-worker violate it.

In addition to the obligation imposed upon a supervisor as an employee of Amtrak to report any violation of a Cardinal Rule to his or her supervisor, it is also every supervisor’s responsibility to communicate the Cardinal Rules to



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ecom@amtrak.com

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his or her employees. A supervisor is responsible to make sure that all employees on his or her team are familiar with the Cardinal Rules, and understand that compliance with the Rules is a condition of employment.

Failure of any employee to report any violation of a Cardinal Rule is a basis for discipline, up to and including termination. If an employee is uncertain whether a Cardinal Rule has been violated, the employee should report it to his or her supervisor, who will in turn make sure that the matter is further investigated.

Should any employee believe that there are extenuating circumstances accompanying any violation of a Cardinal Rule that may mitigate the offense and should be considered in the assessment of discipline, this should be included in the report of the violation. This will be reviewed and considered in any final handling.

Some frequently asked questions (FAQs) are attached for your reference and use. Please also refer to the company Intranet for comprehensive information on Cardinal Rules [here](#). Should you have any additional questions, please discuss them with your supervisor.

I appreciate your support and continued attention to improving our safety culture for everyone's benefit.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "DJ Stadtler". The signature is stylized with a large initial "D" and "J" and a long horizontal stroke at the end.

DJ Stadtler
Executive Vice President and
Chief Operations Officer



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Frequently Asked Questions

Q1. What is a Cardinal Rule?

A1. A Cardinal Rule is a safety action or behavior determined by the Executive Safety Council to be essential to maintaining individual and workplace safety. The Cardinal Rules are those rules whose adherence to are critical in preventing the potential for the most serious of workplace accidents and injuries.

Q2. Why are we doing this?

A2. To set clear expectations on, and accountabilities for, safety-related behaviors and actions that are designed to help us maintain the kind of safe work environment that we all deserve, and our families, our passengers and the public expect.

Q3. Why were these 10 Cardinal Rules selected?

A3. These 10 rules have been identified as uniformly essential across departmental lines to maintaining individual and workplace safety. Adherence to these rules has been identified as critical in preventing the potential for the most serious of workplace accidents and injuries.

Q4. Who selected these Rules?

A4. The Executive Safety Council, which is comprised of senior leaders representing all Amtrak departments. The entire Executive Safety Council felt strongly that we needed to take aggressive action to set clear expectations about critical safety behaviors and actions we must all take, every day.

Q5. What is the process, once a Cardinal Rule violation is believed to have occurred?

A5. There is a review process in place to carefully investigate each alleged violation of a Cardinal Rule. This will involve use of a Cardinal Rules Review Board consisting of the Chief Transportation Officer, equivalent officers as necessary, and Labor Relations as necessary. The Board reviews all Cardinal Rules violations, and makes a final determination on discipline.

Q6. How does the review of a reported Cardinal Rules violation occur?

A6. The review process consists of **two steps**:

First Step:

The first step starts with the reporting of the violation, and then the initial, immediate investigation of what happened, just as occurs today. If following a review of that investigation, it is believed a



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violation or violations occurred, the matter proceeds to the second step.

Second Step:

For agreement employees: Agreement employees who have an alleged Cardinal Rules violation or violations, will be charged and will progress to a disciplinary investigation under the applicable labor contract. If the charges are proven, the case is forwarded to the Cardinal Rules Review Board. The Board will consider the facts and extenuating circumstances, if any exist, before coming to a final decision on discipline. Discipline assessed may be appealed in accordance with the terms of the applicable labor contract.

For non-agreement employees: Non-agreement employees who violate a Cardinal Rule are subject to discipline up to and including immediate termination.

Note: Due to the grave nature of a Cardinal Rules violation, a violation will typically result in severe discipline, including termination. However, the Cardinal Rules Review Board will consider and impose less severe discipline action if there are existing and compelling extenuating circumstances.

- Q7. How do the Cardinal Rules relate to the Confidential Close Call Reporting (C3RS) program?
- A7. The C3RS program with covered unions has its own process, as defined by our Memorandum of Understanding and our agreement with the Federal Railroad Administration. This process supersedes the Cardinal Rules process and requires immediate reporting by those involved.
- Q8. Do the Cardinal Rules apply to all employees?
- A8. Yes – they apply to agreement and non-agreement employees alike. Further, it requires all employees involved in or aware of a violation to report such to their supervisor. Finally, if employees are unclear about the Cardinal Rules they must discuss this with their supervisor.
- Q9. How does this apply to management?
- A9. The Rules apply to all Amtrak employees, supervisors included. Additionally, supervisors are ultimately responsible for making sure that their employees are familiar with the Cardinal Rules, and understand the consequences for violation of the Rules. Further, supervisors will be held accountable for failures to investigate and report violations.
- Q10. These rules seem specific to agreement-covered settings. Why are there not more Cardinal Rules for non-agreement employee settings?



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A10. These 10 Rules have been identified without regard to an employee's status. They are uniformly essential to maintaining individual and workplace safety, and are applicable to all employees, agreement and non-agreement alike.

Q11. Why is a Rule G violation (i.e., alcohol, drug use) not included among the Rules?

A11. The Council felt that Rule G violations, which are already consistently understood, should be separately addressed according to the rules and practices already in place that govern them.

Q12. What if an employee reporting a violation or a supervisor feels that there are extenuating or mitigating circumstances involving a violation of a Cardinal Rule?

A12. If an employee or a supervisor feels there are extenuating circumstances that mitigate disciplinary consequences, he or she should include it with his or her report. This will be reviewed and considered in any final handling.

Q13. Are supervisors held to the same standard?

A13. Yes. Further, as leaders of the company, supervisors must model the safety behavior expected of all employees. Supervisors have the additional responsibility of making sure that the Cardinal Rules are clearly communicated to, understood by, and observed by their employees. Supervisors must promptly report a violation of a Cardinal Rule. A supervisor who is aware of a Cardinal Rule violation and fails to report it is subject to discipline, up to and including dismissal.

Q14. I witness one of my co-workers violating a rule. What is my obligation?

A14. First, take steps to address any safety conditions. Then, you should report the violation immediately thereafter.

Q15. It is said that a violation will "likely lead" to a dismissal/termination. What does this mean?

A15. These 10 Rules have been selected as essential to maintaining individual and workplace safety. If found, any violation of a Cardinal Rule will be handled with zero tolerance, and shall be a basis for discipline, up to and including dismissal. Given the importance assigned to these Rules, termination is likely.

Q16. Will an employee's record (i.e., past discipline, violation notices, etc.) be considered when assessing the consequences for a violation of a Cardinal Rule?

A16. Any reported violation of a Cardinal Rule will be assessed based upon the specific involved facts and issues. While prior record is always reviewed, given the importance assigned to these Rules, a Rule violation shall be a basis for severe discipline, up to and including dismissal and termination of employment with Amtrak.



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Q17. I am a non-agreement employee and do not understand some of the Cardinal Rules. Would you please provide some definitions?

A17. Amtrak takes a proactive approach to control sources of hazardous energy in the workplace. When employees are performing work on machinery or equipment or in other areas where a release of energy is possible, Amtrak requires **lockout/tagout** protection be provided. These policies apply to all hazardous forms of energy including electrical, mechanical, hydraulic, pneumatic, chemical, thermal, and other energy sources.

A **confined space** is a space that is large enough and shaped so that someone can bodily enter and perform assigned work ; and has limited or restricted means for entry and exit (you have to climb, crawl, or otherwise contort to enter and exit – in other words you cannot walk in and out); and is not designed for continuous occupancy.

Workers must get on, in between, and under rolling stock to perform maintenance activities, add or remove cars, or during an inspection. Railroads have adopted the **Blue Signal Protection** procedure in recognition of the danger inherent in these activities.

Blue Signal Protection may consist of a blue-painted metal sign or a steady burning or flashing blue light, or switch and derailment locks that can be opened only by keys assigned to designated employees.

A blue flag or signal displayed on or in front of a piece of rolling stock means that that piece of equipment may not be moved or coupled to. When placed on a car, the blue flag is positioned so it is at right angles to the track and extended for its full size beyond the edge of the car, making it plainly visible.

When protection is needed for a locomotive, two blue flags may be used. Both flags are placed at right angles to the track, but while one extends beyond the engine as on a car, the other extends inward to obstruct the engineer's view from the cab. A blue flag may also be placed on the control stand in the cab. If two or more locomotives are coupled together a blue flag is put on each control panel. Blue signal lights may also be used.

Amtrak requires that employees who are exposed to the risk of a fall be trained in **Fall Protection Equipment** procedures and **Fall Protection** equipment. When employees are performing work on elevated surfaces or in other areas where a fall is possible, Amtrak requires fall protection be provided. Free climbing is not permitted.

