

# Cars on Demand

# Safety Management Plan

Updated December 2018

Business Details	Cars on Demand Operations Pty Ltd L3, 233 Liverpool St, Sydney NSW 2000 ABN: 54 138 953 974 ACN: 138 953 974
Key Contact	Ritta Khoury CEO & Co-Founder <a href="mailto:ritta.khoury@carsondemand.com.au">ritta.khoury@carsondemand.com.au</a> 0421 33 99 59
Business Contact No.	1300 638 0258

## Table of Contents

Overview.....	4
Objectives .....	4
Management Commitment .....	4
Roles & Responsibilities.....	4
Principal Safety Officer Details.....	4
Details of Roles & Responsibilities .....	5
Risk Management.....	6
Risk Consequence Rating .....	6
Risk Likelihood Rating.....	6
Risk Assessment Register .....	6
Consultation, Communication & Review.....	13
Consultation.....	13
Communication .....	13
Review.....	13
Induction, Training & Reinforcement .....	13
Driver Engagement Flow Chart .....	14
Safety Requirements Specific to Affiliates & Drivers .....	14
Drivers Licence .....	14
Authorisation Documentation .....	14
Driver Criminal Offences Check.....	15
Driver Health Check.....	15
Driver Fatigue Policy .....	15
Drug & Alcohol Policy .....	15
Safe Pickup & Dropoff.....	15
Do Not Solicit Policy.....	15
Code of Conduct .....	16
Vulnerable Passenger Policy .....	16
Safety Obligations.....	16
Safety Breach Consequences .....	16
Safety Requirements Specific to Vehicles.....	17
Registration.....	17
Insurance.....	17
Maintenance .....	17

Defects .....	17
Summary of rights and obligations of passengers .....	18
What passengers can expect.....	18
Passengers obligations.....	18
Prohibited passenger conduct .....	18
Reporting .....	19
What is a Notifiable Occurrence .....	19
Reporting a Notifiable Occurrence (When & How) .....	20
Reporting Responsibilities.....	20
Driver Consequences for Notifiable Occurrences .....	21
Risk Assessment and Process Improvement.....	21
Notifiable Occurrence Process Summary .....	22

## Overview

### Objectives

This Safety Management Plan (referred to hereafter as SMP) has been developed to outline our approach to managing work health and safety (WHS) for all point-to-point transfers taken by Cars on Demand customers with services being rendered by authorised affiliated operators and subcontractor drivers.

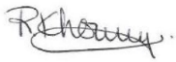
### Management Commitment

Cars on Demand management commit that we will:

- make this plan available to all staff, affiliated operators and subcontractor drivers and ensure they have the opportunity to read, understand, clarify and ask questions
- ensure adequate training, communication and operator/driver active agreement
- keep a copy of the SMP readily available on our website [www.carsondemand.com.au](http://www.carsondemand.com.au) at all times
- review the plan on an annual basis or as otherwise required and make any revisions known to staff, affiliated operators and subcontractor drivers.

## Roles & Responsibilities

### Principal Safety Officer Details

<b>Name:</b>	Ritta Khoury
<b>Title:</b>	CEO & Co-Founder
<b>Work phone:</b>	1300 638 258
<b>Mobile phone:</b>	0421 33 99 59
<b>Email:</b>	ritta.khoury@carsondemand.com.au
<b>Principal safety officer signature:</b>	
<b>Date:</b>	14 December 2018

## Details of Roles & Responsibilities

Name	Position	Safety responsibilities
Ritta Khoury	CEO & Co-Founder, Principle Safety Officer	<ul style="list-style-type: none"> <li>• Consult with relevant parties on safety needs</li> <li>• Create framework for a <b>Safety Management System (SMS)</b></li> <li>• Document the SMS in the Safety Management Plan (<b>SMP</b>)</li> <li>• Ensure implementation, training &amp; compliance</li> <li>• Review SMP annually or as required</li> </ul>

Simon Kalipciyan	COO & Co-Founder	<ul style="list-style-type: none"> <li>• Relay operational risks to Safety Officer</li> <li>• Collaborate on creation of Safety Management System</li> <li>• Review final SMP</li> <li>• Ensure compliance at operations level for every booking</li> <li>• Report any incidents/accidents as immediately as possible to Safety Officer</li> <li>• Collaborate on annual review</li> </ul>
------------------	------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

As per booking offloaded	Affiliated Authorised Fleet Operators	<ul style="list-style-type: none"> <li>• Understand and accept the Cars on Demand safety responsibilities</li> <li>• Ensure compliance at operations level for every booking accepted from Cars on Demand</li> <li>• Report incidents/accidents to Cars on Demand as immediately as possible</li> <li>• Relay operational risks to the Cars on Demand Safety Officer</li> </ul>
--------------------------	---------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

As per booking offloaded	Subcontractor Drivers	<ul style="list-style-type: none"> <li>• Understand and accept the Cars on Demand safety responsibilities</li> <li>• Ensure compliance at operations level for every booking accepted from Cars on Demand</li> <li>• Report incidents/accidents to Cars on Demand as immediately as possible</li> </ul>
--------------------------	-----------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

## Risk Management

### Risk Consequence Rating

- Minor – occurrence of risk could lead to minor inconvenience to driver and/or passengers
- Moderate – occurrence of risk could lead to significant inconvenience and dissatisfaction for drivers and/or passengers
- Major – occurrence of risk could lead to harm or injury to driver and/or passengers

### Risk Likelihood Rating

- Unlikely – risk unlikely to happen
- Possible – risk is possible
- Likely – risk is likely to happen

### Risk Assessment Register

Hazard	Description of Risk	Risk Consequence	Risk Likelihood	Risk Control Measures
Extreme Adverse Weather Conditions – Severe Floods & Fire	Extreme weather conditions (floods and fires) pose a high immediate danger. In addition associated detours and road closures can lead to poor driving conditions and increase risk of driver disorientation and stress and therefore increased risk of incidents/accidents occurring.	Major	Unlikely	<ul style="list-style-type: none"> <li>• Driver must check traffic conditions and adverse weather conditions on relevant websites well ahead of booking time</li> <li>• If necessary driver may need to choose alternate route or call Cars on Demand to advise trip cancellation</li> </ul>

Animal strikes in rural areas	Wild animals suddenly appearing on roads – particularly in rural and remote areas. This could lead to increased risk of accidents especially if driving at high speeds.	Major	Possible	<ul style="list-style-type: none"> <li>• Drivers must drive carefully in remote and rural areas – especially in areas with signage regarding recorded incidence of animal road crossings</li> <li>• Drivers should ensure mobile phone battery/power to call for help in the event of an incident</li> </ul>
Assistance animal (guide dog) rejection	Driver refusing to accommodate assistance animal (guide dog) for visually impaired passengers. This could lead to stress for the passenger and a delay in arriving at their destination on time.	Moderate	Unlikely	<ul style="list-style-type: none"> <li>• Passenger can indicate assistance animal on booking sheet</li> <li>• Drivers are required under the terms of the SLA to accept guide dogs</li> <li>• It is highly unlikely that a registered driver would refuse an assistance animal</li> </ul>
Black Ice	A transparent coating of ice, on a road surface. This could lead to increased risk of accidents.	Major	Unlikely	<ul style="list-style-type: none"> <li>• Driver should take note of precautionary signs and take care especially in areas known to be prone to black ice. This phenomenon is not common in most parts of Australia</li> </ul>
Condition of vehicle unfit for service	Any significant vehicle fault such as faulty brakes, flat tyres, damaged windscreen, faulty headlights or tail lights or other mechanical faults can lead to an increased risk of accidents.	Major	Unlikely	<ul style="list-style-type: none"> <li>• Drivers are required to maintain vehicles as per manufacturers requirements</li> <li>• Drivers receive request to confirm the vehicle is fit for service 90min before every booking.</li> </ul>
Driver criminal offences	Driver has undeclared or unchecked criminal offences which could increase risk of inappropriate conduct and/or negligent driving and therefore increased risk of accidents or injury to passengers.	Major	Unlikely	<ul style="list-style-type: none"> <li>• Drivers are checked for criminal offences as part of becoming authorised to operate public passenger vehicle</li> <li>• Driver checks are conducted either through an online mechanism (NSW P2P Portal DVD) or capture of official Driver authorisation documentation (such as VIC DC - <i>Driver Certificate</i>).</li> <li>• Ongoing checks via online systems or updated documents</li> </ul>

Drivers not adhering to road rules	Drivers not adhering to road rules particularly speed limits, wearing seatbelt, No Stopping and No Parking rules can lead to an increased risk of accidents.	Moderate-Major	Possible	<ul style="list-style-type: none"> <li>• Driver SLA requires drivers to adhere to all road rules &amp; regulations</li> <li>• Drivers confirm their agreement to adhere to road rules 90min before every booking.</li> </ul>
Driving for long distances or long periods - fatigue	Driving for long distances or long periods of time can affect driver concentration and increase the risk of accidents.	Major	Possible	<ul style="list-style-type: none"> <li>• Cars on Demand places limits on hourly bookings with the same driver and stipulates extended hourly bookings for more than 12 hours will require a change of driver.</li> <li>• SLA stipulates that driver must manage fatigue and factor that in when accepting Cars on Demand bookings</li> <li>• Drivers are required to confirm they are not fatigued 90min before every booking</li> </ul>
Driving outside normal business hours - fatigue	Late night and early morning driving can increase fatigue and disorientation and therefore lead to an increased risk of accidents.	Major	Possible	<ul style="list-style-type: none"> <li>• SLA stipulates that driver must manage fatigue and factor that in when accepting Cars on Demand bookings</li> <li>• Drivers are required to confirm they are not fatigued 90min before every booking</li> </ul>
Drug and alcohol consumption	Drug and alcohol consumption, however minimal, can impair driver judgement and lead to disorientation and slow reflexes therefore leading to an increased risk of accidents and injury.	Major	Unlikely	<ul style="list-style-type: none"> <li>• SLA requires drivers to be completely free of the influence of drugs and alcohol when accepting and fulfilling Cars on Demand bookings</li> <li>• Drivers are required to confirm they are not under the influence of drugs or alcohol 90min before the start of every booking</li> </ul>



Emergency Response Equipment Inadequacy	Inadequate or missing tools such as first aid kits, reflective vest, reflective portable road signs can increase the risk of injury during an emergency situation.	Moderate – Major	Unlikely	SLA requires drivers to have adequate emergency response equipment - at minimum first aid kit, reflective vest and portable reflective road signs.
Fatigue	As outlined above under - Driving long distances/period & - Driving outside normal business hours.	-	-	-
Fog	Fog conditions can reduce visibility and increase the risk of accidents.	Moderate – Major	Unlikely	SLA requires drivers to reduce speed in fog conditions and use fog lights.
Inadequate mobile phone battery/power	Inadequate mobile phone battery/power can increase the risk of a driver not being able to communicate with passengers, Cars on Demand Operations Manager and Emergency Support Services in the event of an incident. This can cause increased risk of driver speeding, stress and therefore increased risk of accidents and injury	Moderate-Major	Possible	<ul style="list-style-type: none"> <li>• SLA requires drivers to ensure they have sufficient battery power and in-vehicle charge tools.</li> <li>• 90min before every booking drivers are required to confirm sufficient battery power and be contactable just before and during a booking</li> </ul>

Incident reporting failures	Driver failing to report an incident before, during or after a passenger booking can cause an increased risk of injury to subsequent passengers and risk of notifiable offences not being reported to relevant authorities in a timely manner.	Minor-Moderate-Major	Possible	<ul style="list-style-type: none"> <li>• SLA requires drivers to report incidents as immediately as safely possible</li> <li>• 90min before every booking drivers are required to re-confirm their agreement to report incidents as immediately as safely possible.</li> <li>• Passengers are sent a driver rating SMS following every booking which allows them to rate a driver and provide comments. Any rating below a 4/5 triggers an email to COD management and is followed up by Cars on Demand to establish cause of dissatisfaction and possible unreported incidents.</li> <li>• Drivers are counselled once on minor unreported incidents – a second failure to report would result in instant dismissal.</li> <li>• Drivers who do not report a major incident would be instantly dismissed</li> </ul>
-----------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------	----------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p>Passenger(s) getting in the wrong car with the wrong driver</p>	<p>Inadequate information delivered to the passenger can lead to an increased risk of the passenger getting into the wrong car with the wrong driver</p>	<p>Minor-Moderate-Major</p>	<p>Unlikely</p>	<ul style="list-style-type: none"> <li>• COD has automated messaging in place which automatically sends the passenger a text message 2 hours before pickup advising driver details (name &amp; contact number).</li> <li>• Drivers are required to arrive at pickup points at least 10min before pickup and to use the COD mobile app to send the customer a text message reconfirming their details: name, vehicle plate number and where they are parked.</li> <li>• COD platform used number scrambling technology to mask the customer and driver numbers and only allows contact just before and during a booking timeframe. This is a security measure which is highly valued by customers.</li> <li>• COD used integrated technology to monitor driver-customer communications.</li> </ul>
<p>Route planning inadequacy</p>	<p>Drivers can become stressed or anxious by unfamiliar routes/locations and may become disoriented or get lost therefore increasing the risk of accidents and injury</p>	<p>Moderate</p>	<p>Unlikely</p>	<p>Cars on Demand driver mobile app has integrated Google mapping technology designed to assist drivers. By clicking on the “Pick up” or “Destination” drivers will automatically be taken to Google maps with assisted turn -by-turn navigation from their current location to the desired point.</p>
<p>Security threats</p>	<p>Situational security threats such as a bomb threat or bomb, terrorist attack or other major disruption or incident can lead to widespread chaos, disorientation and increased driver stress and anxiety which could increase the risk of accidents and injury</p>	<p>Major</p>	<p>Unlikely</p>	<p>Service Level Agreement requires drivers to remain calm in the event of a security threat, to cooperate with Police, transport rangers and other emergency response personnel as required and deliver themselves and passengers to the nearest safe holding area which minuses risk to both the driver and passengers.</p>

Solicitation/touting at airports and event venues	Illegal solicitation or “touting” can lead to increased driver stress and increase risk of exposing passengers to drivers with notifiable offences.	Moderate – Major	Unlikely	<ul style="list-style-type: none"> <li>• SLA specifically prohibits drivers from solicitation and touting</li> <li>• Penalty would be immediate termination from the COD driver network without ability to reapply and notification to authorities.</li> </ul>
Traffic congestion	Persistent delays in traffic over a day or a number of days can lead to increased driver stress and therefore increase the risk of accidents and injury.	Minor – Moderate	Likely	<ul style="list-style-type: none"> <li>• SLA requires drivers to remain calm under traffic congestion duress and to contact Operations Management for a recall of pending bookings in the event that they cannot control their stress levels.</li> </ul>
Unsafe pickups & drop-offs	Drivers stopping in <i>No Stopping</i> zones or on very congested main roads, or on the wrong side of the road to pick up and drop off passengers can cause an increased risk of accident or injury.	Moderate-Major	Unlikely	<ul style="list-style-type: none"> <li>• SLA stipulates that driver must take special care when dropping and picking up passenger to ensure passengers are safe at all times.</li> <li>• SLA specifically prohibits drivers from stopping or parking illegally to pickup and drop off passengers</li> <li>• 90minutes before every job a driver must confirm safe pickup and drop off as per road rules.</li> </ul>
Vulnerable passenger inadequate assistance	Drivers may be impatient and unwilling to assist vulnerable passenger with physical disability which could increase the risk of passenger accident or injury when entering or exiting the vehicle	Minor-Moderate	Unlikely	<ul style="list-style-type: none"> <li>• SLA requires drivers to exit the vehicle to greet passengers and to assist vulnerable passengers with entry to &amp; exit from the vehicle.</li> </ul>

## Consultation, Communication & Review

### Consultation

In creating the framework for the Cars on Demand Safety Management System, management collaborated with affiliate operators, independent subcontractor drivers, other operators with long standing Safety Management System requirements (such as bus and coach companies), legal counsel, technology designers and customers (both executive assistants and travellers).

### Communication

1. Communication of the SMP is integrated into the end-to-end driver engagement process for optimum understanding, agreement and compliance by all operators and drivers
2. The SMP is posted on each Driver Account Profile and agreement indicated by a ticked check box which is required to be updated annually or as otherwise required by legislation or regulation changes in various states.
3. The SMP is posted on the Cars on Demand website for easy driver and customer access.
4. Drivers receive a quarterly email reminder of the SLA and SMP obligations with attached documents for quick reference.
5. Drivers receive an annual email request to review the updated SLA & SMP and check their agreement - which will be date stamped and stored on our automated system.

### Review

Management commitment as outlined above is to review the SMP on an annual basis or as otherwise required (due to changes in applicable legislations and regulations) and to make any revisions known to staff, affiliated operators and subcontractor drivers by the communication initiatives outlined above under *Communication*.

## Induction, Training & Reinforcement

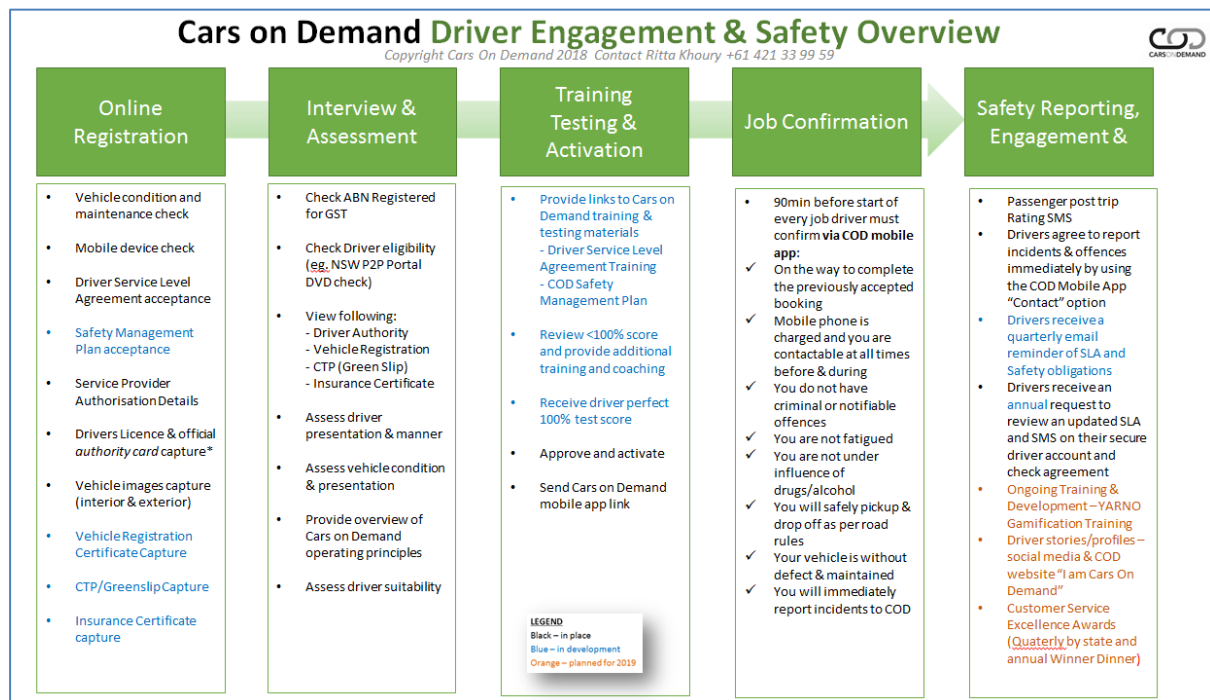
The SMP training and reinforcement is fully integrated into every step of the driver engagement process as outlined below in the Driver Engagement Flow Chart.

Details of critical safety requirements and how they are met are displayed below each step in the Chart.

These mechanisms are mostly integrated into our automated platform via the ***Driver Account Profile*** & the ***Driver COD Mobile Phone Application*** (iOS and Android) and otherwise clearly outlined in the ***Driver Service Level Agreement*** and ***Safety Management Plan*** which drivers must read and accept on registration otherwise they cannot proceed to the next step of engagement.

Continuous reinforcement of the SMP is achieved via quarterly obligation reminders and annual requests for review of updated SLA and SMP and active agreement via a checked box – which will be date stamped and stored on our automated system.

## Driver Engagement Flow Chart



## Safety Requirements Specific to Affiliates & Drivers

### Drivers Licence

During online registration drivers are required to provide their Driver's License number and to upload a photo of their DL (front and back).

They also agree, via the SLA, to COD conducting an online check of their information in states where this is applicable – such as the NSW P2P Portal DVD.

Where applicable COD will then upload all driver's licence details into online systems at least once a month to run a check and ensure a driver is eligible.

COD will automate these uploads and licence checks once that functionality is made available in various states.

During the interview with a COD Operations Manager the DL is again checked.

### Authorisation Documentation

During online registration drivers are required to upload a photo of their driver authorisation documentation (front and back).

Some examples at a state level:

- NSW has eliminated the Driver Authority Card and this is no longer required. Instead, during registration drivers need to check a box that confirm they have a PT code on their licence
- VIC still issues a DC (Drivers Certificate). VIC drivers are required to upload a photo of their DC

### Driver Criminal Offences Check

These checks are facilitated by relevant authorities in various states. In NSW the checks are facilitated by uploaded driver information to the P2P Driver & Vehicle Dashboard. In other states it forms part of the securing and maintenance of a relevant license.

### Driver Health Check

This is facilitated in all states by the relevant authority which authorises the driver to perform the relevant service of public passenger transport.

### Driver Fatigue Policy

The COD SLA specifically addresses a driver's need to manage fatigue. There are strict consequences for non-compliance which include immediate termination and possible reporting to relevant authorities. Please refer to the Cars on Demand SLA for more details.

In addition, 90min before every booking drivers are required to confirm that they are not fatigued.

### Drug & Alcohol Policy

The SLA specifically stipulates that driver cannot be under the influence of any drugs or alcohol when accepting or completed Cars on Demand bookings. There are strict consequences for non-compliance which include immediate termination and possible reporting to relevant authorities. Please refer to the Cars on Demand SLA for more details.

In addition, 90min before every booking drivers are required to confirm they are not under the influence of any drugs or alcohol.

### Safe Pickup & Dropoff

The SLA requires drivers to pickup and drop off safely and ensure they abide by road rules at all times. The SLA instructs drivers to find the nearest legal parking spot to a customer's requested pickup address and notify the client in their obligatory text message (sent at least 10min before pickup).

The SLA also requires drivers to drop off safely and ensure they abide by road rules at all times. Even if a customer requests a driver to drop off in an illegal spot drivers are instructed to politely refuse and to immediately refer the matter to COD management who will liaise with the customer.

In addition, 90min before every booking drivers are required to confirm they will abide by all road rules for safe pickup and drop off.

### Do Not Solicit Policy

COD has a strict non-solicitation and touting policy. Any driver who is found out to be "touting" will be immediately terminated and reported to the relevant authorities. This is unacceptable conduct

which puts everyone in the industry at risk and COD management has zero tolerance for such behaviour.

### Code of Conduct

The COD SLA outlines a strict code of conduct. Please refer to the SLA for more details.

These requirements are reinforced during driver training and ongoing communications. Drivers are also constantly being rated by customers via our automated SMS rating system. Customers are very quick to give low ratings and commentary when drivers and vehicles do not meet expectations. We use this feedback for review and coaching and any driver who is unwilling to remedy issues will be immediately terminated.

To date Cars on Demand Drivers have consistently received high ratings and our current collective average is approximately 4.7/5.

We feel confident that our onboarding, training & continuous communication approach is having the desired effect of curating a platinum level driver network.

### Vulnerable Passenger Policy

The SLA clearly outlines our expectations for drivers to carefully assist vulnerable passengers and passengers with assistance animals (guide dogs). We have a long standing relationship with Vision Australia and a deep respect for our visually impaired clients, elderly clients and other vulnerable passengers.

Please refer to the SLA for more details.

### Safety Obligations

Every driver who registers with Cars on Demand understands through registration, training and communication that they have a primary safety duty to meet all the safety measure outlined in the Safety Management Plan and reinforced in the Service Level Agreement.

They check their agreement on registration and re-confirm this agreement 90min before every Cars on Demand booking.

We are confident that every driver in the Cars on Demand network understands and strives to comply with our safety standards.

### Safety Breach Consequences

Any driver who is found to be in breach of any of the safety requirements will be counselled and given a chance to remedy any gaps in knowledge. Any subsequent breaches will result in immediate termination.



Any breaches which result in harm or injury will result in immediate termination, notification to the relevant authorities and other large industry operators as per the notifiable occurrences guidelines contained herein.

## Safety Requirements Specific to Vehicles

Cars on Demand does not own or operate any vehicles. Every booking we accept from a customer is fulfilled by an affiliated operator or subcontractor driver as per our Service Level Agreement. Every affiliated operator and subcontractor driver are responsible for the maintenance of vehicles which are roadworthy and in accordance with the requirements outlined by the relevant authorities.

Cars on Demand facilitates the due diligence towards ensuring suitable vehicles in the following manner:

### Registration

Vehicles in use by affiliated operators and subcontractor drivers must have the appropriate and up to date vehicle registration required by the relevant authorities in each state.

Registration paperwork must be uploaded during the online registration process.

Registration papers must also be presented during the face to face interview with a COD manager prior to activation.

Registration paperwork must be updated on the driver profile when updated for the next registration period.

### Insurance

Vehicles in use by affiliated operators and subcontractor drivers must have the appropriate insurance cover required to comply with insurance requirements by the relevant authorities in each state.

The insurance documentation must be uploaded during the online registration process and updated accordingly for each new period of insurance.

Insurance documentation must be presented during the face-to-face interview with a COD manager prior to activation.

Insurance paperwork must be updated on the driver profile when updated for the next insurance period.

### Maintenance

Vehicles must be maintained according to manufacturer's recommendations.

For the purpose of accepting and fulfilling Cars on Demand bookings, appropriate vehicle maintenance is deemed to have taken place with the presentation of up-to-date relevant Registration paperwork.

### Defects

Vehicles with any/all defects are not deemed to be suitable for fulfilling Cars on Demand bookings. Affiliated operators and subcontractor drivers are required to immediately report defects at which

point they will be unable to accept bookings until the defect are fully fixed and resolved. Any existing bookings allocated to any affiliated operator or subcontractor driver will be recalled and allocated to other drivers until the defect is fully repaired & resolved.

## Summary of rights and obligations of passengers

When traveling with a Cars on Demand affiliated operator or subcontractor driver the following rights and obligations apply to all passengers. This is a summary only and full details can be found in the *Cars on Demand Terms & Condition* posted on our website.

### What passengers can expect

- To see the driver's authority document displayed prominently (where applicable)
- The vehicle to be perfectly clean and tidy and in perfect mechanical working order
- The vehicle cabin to be at a comfortable temperate
- The driver to behave in an elegant and professional manner and act with perfect civility and propriety conduct at all times
- The driver to smoothly and confidently navigate from the pickup point to the destination
- The driver to comply with reasonable en-route requests
- The driver to assist with luggage if required
- The driver to assist vulnerable passengers where required

### Passengers obligations

- To behave professionally at all times and demonstrate civility and proprietary conduct at all times
- To be clear and concise with en-route requests and understand that driver may not be able to accommodate all last minute requests
- To ensure that all property is collected from the vehicle before exit
- To understand that lost property may not be able to be returned instantly depending on the driver's other booking obligations

### Prohibited passenger conduct

- Placing feet on seats
- Smoking in or near the vehicle
- Spitting in or from the vehicle
- Use of offensive or abusive language
- Interference with equipment in the vehicle
- Throwing anything in or from the vehicle
- Damage to the inside or outside of the vehicle

Customer complaints relating to a Cars on Demand service can be made by telephone, email or response to the automated driver rating SMS. All customer complaints must be finalised in writing to the office of the CEO and will be investigated and reported to the relevant authorities as required.

## Reporting

The immediate reporting of all incidents and accidents is equally the responsibility of both the passenger and the driver.

Cars on Demand has invested heavily in technology which allows passengers to immediately report any unsatisfactory element of their transport immediately after a trip is taken. This occurs via an automated text message sent to the passenger's mobile number immediately after a trip is taken. The passenger can provide a rating and any relevant comments. Any rating below a 4/5 triggers an email to COD management for investigation and relevant action.

The COD SLA requires drivers "must immediately report to COD any problems, customer or passenger complaints, incidents or accidents that occur during the trip, including any form of inappropriate behaviour by a customer. The Contractor must not under any circumstances be impolite, rude or abusive to a customer or other customer. If the pickup has not taken place the Contractor must contact COD immediately for assistance. If already in transit, the Contractor must use his/her best endeavours to deal with the situation calmly and professionally, and ensure the safe delivery of both him/herself and the customer or customer(s) to the destination point or, if not practicable, the nearest safe spot. The Contractor must then call COD immediately to report the occurrence."

We specifically do not include any specific examples as we do NOT want drivers making any decisions on what should be reported. ABSOLUTELY anything other than the perfect execution of a point-to-point transfer without delay or incident MUST be reported immediately to COD.

COD Management will then determine what constitutes a "notifiable occurrence" which should be reported to the relevant authorities. The guidelines used by COD management to make the determination are outlined herein.

### What is a Notifiable Occurrence

- an accident or incident associated with the provision of a passenger service that has, or could have caused death (whether it is the driver, passenger or another person)
- an accident or incident involving a passenger vehicle which results in a person being treated by ambulance officers or transported by ambulance, or admitted to hospital as a result of the injury
- an accident or incident involving a passenger vehicle that results in a collision or impact with another vehicle, structure or person, which results in the vehicle being unable to continue its journey
- a vehicle fault, that may include a failure of any brake, steering or suspension system, or wheels or tyres, which results in the vehicle not being able to commence or complete its journey

- any incident involving a driver, passenger or intended passenger of a passenger vehicle that results in a complaint being made to police involving an allegation of sexual assault, indecent exposure, physical assault, threatening behaviour (physical threat or intimidation against or by the driver)
- where a driver, in the course of providing of a passenger service, is charged with a major traffic offence – such as predatory driving, police chase high-range speeding, positive drug test

## Reporting a Notifiable Occurrence (When & How)

**Any** occurrence should be reported to COD by both drivers and passengers as immediately as possible following a transfer.

On receiving a report of “an occurrence” Cars on Demand management will

1. immediately contact both customer and driver to document the incident from both perspectives
2. Use the *notifiable occurrence guidelines* outlined above to determine if the offence is notifiable to the relevant authorities
3. If notifiable, COD management will make the necessary notifications to the relevant authorities as immediately as possible. The mechanism of reporting to the relevant authorities will be as per the requirements in each state. Note, in NSW all notifiable occurrences must be made using the NSW Commission P2P Industry Portal <https://portal.pointtopoint.nsw.gov.au/industryportal/s/login/>

## Reporting Responsibilities

1. Passengers – have a responsibility to report all incidents or unsatisfactory aspects as immediately as possible. Passengers can use the post trip SMS text prompt to rate a driver/trip and provide comments or call COD directly for 24/7 support.
2. Drivers – have a responsibility to report immediately all/any incident or occurrence outside of the perfect execution of a point to point trip or the perfect professional interaction with a customer. Drivers can use the COD Driver Mobile App to contact COD directly for 24/7 support.
3. COD Management – have a responsibility to
  - a. investigate both sides of any reported incident (driver and passenger)
  - b. record the incident in the booking reference administrative notes section
  - c. determine if the incident is officially notifiable, if yes

- d. formally notify relevant authorities through the relevant reporting channels  
Note, in NSW all notifiable occurrences must be made using the NSW Commission P2P Industry Portal <https://portal.pointtopoint.nsw.gov.au/industryportal/s/login/>

### Driver Consequences for Notifiable Occurrences

Driver conduct is reviewed in relation to all occurrences – including notifiable occurrences.

For minor occurrences which can be remedied through immediate education/training the driver will receive the necessary education and training and one grace notice. Any repeat occurrence however small or incidental will result in immediate termination without ability to re-enter the network again.

For all serious, notifiable occurrences resulting from driver negligence or deliberate action driver termination is immediate without ability to re-enter the network and reporting to relevant authorities and other large operators.

### Risk Assessment and Process Improvement

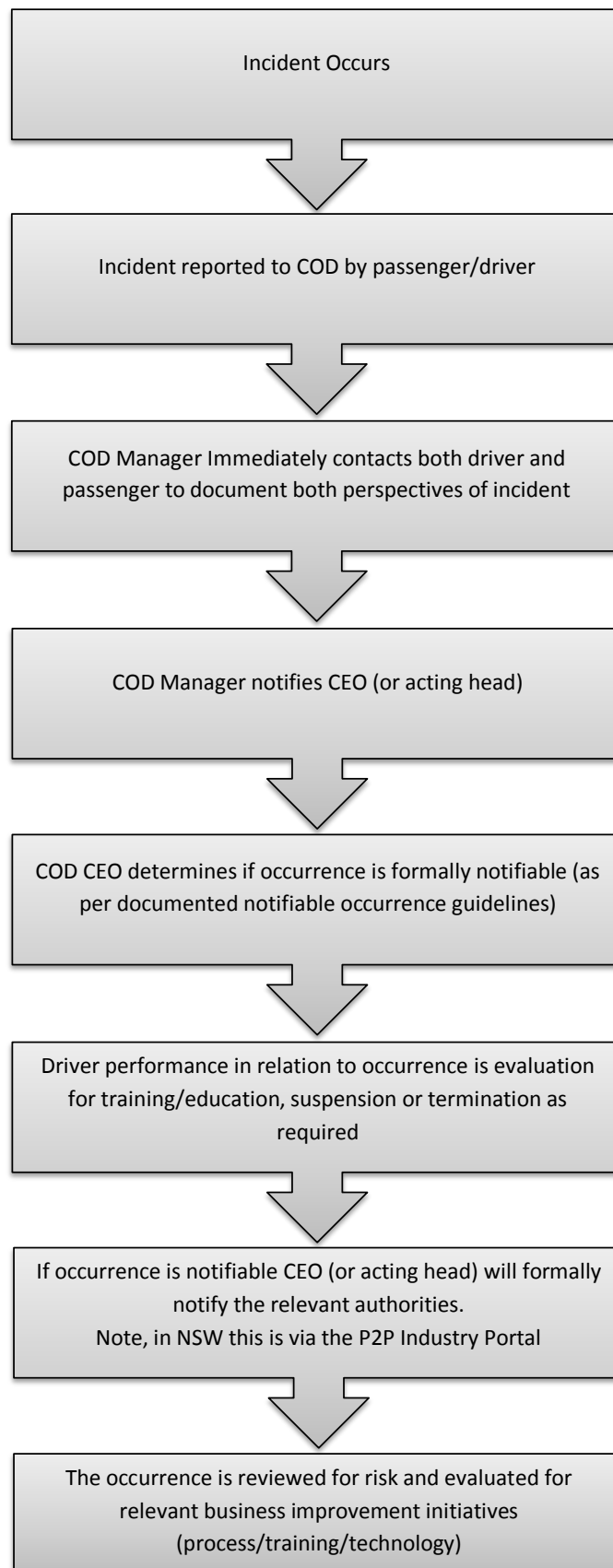
Every incident must be evaluated for risk and reviewed to understand if any aspect of the business can be improved through training, process improvement or technology investment.

Many of the current advanced quality control features and integrated technology checks have evolved through this carefully considered approach to safety and risk management.

Examples include:

- Driver job confirmation
- Driver automated system phone call
- COD management automated phone call alerts
- Customer post trip satisfaction SMS
- Number masking (drivers and customers communicate without seeing actual numbers)
- Automated COD rating alerts for customer rating less than 4 (out of 5)

## Notifiable Occurrence Process Summary



End of Document