

HSE and Safety Policy

Protecting every person in and around our operations

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POLICY OWNER Health, Safety and Environment Lead	APPROVED BY Jorge O. Freig Carrillo, Chief Executive Officer	NEXT REVIEW June 2027

1. Purpose

Our work places people alongside heavy vehicles, container handling equipment, regulated cargo and public roads across two jurisdictions. This policy sets the health, safety and environment standard that governs how that work is planned, performed and supervised.

2. Scope

This policy applies to every entity, facility, employee, officer, temporary worker and contracted third party operating under the Freig Logistics Group name, including Nogales Transportation Services, LLC and every affiliated transportation, customs brokerage and warehousing company within the group. It applies at all owned and leased facilities in the Arizona and Sonora corridor and on every lane managed on behalf of a client, on both sides of the United States and Mexico border.

3. Guiding Principle

Every person working for or with Freig Logistics Group has the authority and the obligation to stop any activity they believe to be unsafe, and will face no disadvantage for doing so.

4. HSE Commitments

Freig Logistics Group commits to the following.

1. Comply with all applicable occupational health and safety law, including in the United States 29 CFR Part 1910 and Part 1926 administered by OSHA, the Federal Motor Carrier Safety Regulations at 49 CFR Parts 380 to 399, and MSHA requirements at 30 CFR Part 46 and Part 48 where site access requires them; and in Mexico the Federal Regulation on Occupational Safety and Health administered by STPS together with the applicable Normas Oficiales Mexicanas.
2. Identify hazards and assess risk before any new lane, facility, task or piece of equipment is introduced, and apply controls in the order of elimination, substitution, engineering, administrative controls, then personal protective equipment.
3. Manage driver fatigue against both 49 CFR Part 395 on the United States side and NOM-087-SICT-2-2024 on the Mexican side, applying whichever standard is stricter for any given movement, and manage journeys through documented journey management for long, remote or high risk routes.
4. Verify competency before authorization. Every driver, equipment operator and yard worker completes induction, role specific training and, where the client site requires it, site induction and MSHA 5000-23 training before starting work.
5. Inspect and maintain vehicles, trailers, container handling equipment and light vehicles on a preventive schedule, with defect reporting and a clear rule that defective equipment is removed from service.
6. Provide, maintain and require the correct personal protective equipment for every task and location, including client site requirements.

7. Report every incident, injury, near miss and hazard through a single reporting channel within the defined timeframe, investigate to root cause, and share learnings across the group.
8. Maintain and test emergency preparedness and response arrangements for road incidents, cargo release, fire, medical emergency and severe weather, on both sides of the border.
9. Flow HSE requirements down to every contracted carrier and subcontractor through contract terms, qualification criteria and monitoring, and apply client site rules wherever they are more stringent than our own.
10. Consult the workforce on matters affecting their health and safety through toolbox talks, pre task briefings and an open reporting culture.

5. Stop Work Authority

Stop work authority is unconditional. Any person may stop work without seeking permission where they identify an imminent risk to a person, to the public or to the environment. Work does not resume until the hazard has been assessed and controlled and the responsible supervisor has authorized restart. Retaliation against any person for exercising stop work authority is a disciplinary matter.

6. Responsibilities

- The Chief Executive Officer is accountable for HSE performance and for providing the resources required to deliver this policy.
- Managers and supervisors are responsible for the safety of the work under their control, for pre task risk assessment, and for acting on every hazard reported to them.
- Every employee and contractor is responsible for working to the standard, using the equipment provided, reporting hazards and incidents, and stopping unsafe work.
- Contracted carriers are responsible for the safety of their own drivers and equipment and for meeting the standards set in their contract and in the Subcontractor and Carrier Code of Conduct.

7. Performance Measurement

HSE performance is measured through both lagging and leading indicators. Lagging indicators include total recordable injury frequency rate, lost time injury frequency rate, vehicle incident rate and regulatory violations. Leading indicators include near miss reporting rate, hazard close out rate, planned inspection completion, training currency and stop work events raised. Results are reported to management and to clients where the contract requires it.

8. Review

This policy is reviewed at least annually, and immediately following any serious incident, significant change in operations or change in applicable regulation.

Approved and issued by

Signature and date

Jorge O. Freig Carrillo
Chief Executive Officer
Freig Logistics Group
