Ms. Ireland,

As you requested, please see the following:

1. A copy of all rules/policies applicable to Shamrock employees, including disciplinary policies, policies relating to troubleshooting technological issues, etc. If Shamrock does not have written policies/rules, please so advise.

The handbook is main source of rules and policies applicable to Shamrock employees. However, another avenue is through conversions and safety meetings between the Site Supervisors and the drivers/employees.

2. A copy of Shane Smith's personnel file.

A copy of Smith's personnel file is included in the Exhibits, and also included here as well.

3. Are team leads supervisors?

Team leads are not supervisors as defined by the Act, but led by example and are good with other employees. They don't take off and are reliable, and answer to the supervisor at the site.

4. Have any other employees engaged in the same conduct for which Smith was suspended and terminated? Please explain and provide supporting documents, including disciplinary documents and employee contact information.

No other employee to the Employers knowledge has ever done this type of behavior. The drivers are not allowed in meetings with our customers. That includes our accounts, repair, fuel or any other supplier that Shamrock engages business with. That includes never calling the companies Shamrock is providing a service too or calling its service providers such as fuel, repair or a malfunctioning electrical computer system. Only the operations supervisor is allowed to engage in Shamrock business.

If you have any other questions, concerns, or requests I will be happy to oblige.

Thank you,

/s/ James Allen

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