

III. Enhanced Abatement Measures Relating to S.P.E.E.D.¹

Respondents agree to develop and implement the following enhanced abatement measures pursuant to the deadlines identified in Section III aimed at ensuring compliance with regulatory standards related to S.P.E.E.D., and, as applicable, to maintain these measures in place at least until the termination of this Agreement. *[Note, Respondents have already implemented some of these enhanced abatements.]*

(A) Management Leadership Involvement and Commitment.

1. Staffing Commitments.

a. Manager of Store Safety.

- i. Add and maintain Manager of Store Safety qualified by training, education, and/or experience, to report to Director of EH&S.
- ii. If position becomes vacant, Respondent will make reasonable efforts to fill the vacancy until filled.

b. EH&S Specialists.

- i. Add and maintain two (2) new staff positions qualified by training, education and/or experience, to report to Manager of Store Safety.
- ii. If positions become vacant, Respondent will make reasonable efforts to fill vacancies until filled.

2. Corporate Leadership Meetings.

a. Chief Operating Officer will meet regularly with Store Operations and EH&S leadership to review the Safety and Health Program, progress implementing this Agreement, OSHA compliance, and to ensure a focus on continual improvement in S.P.E.E.D. areas at retail locations

b. External Trade Association/Industry Meetings.

- i. A Company representative will make reasonable attempts to present at one (1) trade association/industry meeting per year, at minimum, during the term of the Agreement.
- ii. The primary purpose of the presentations will be to share

¹ SPEED is the short-hand moniker used to describe a Dollar Tree safety initiative that focuses on ensuring safety and regulatory compliance related to: "S"- Stacking height no higher than eight feet and stable; "P" - Pathway clearance to all exit doors; "E"- Extinguishers unblocked; "E"- Electrical panels unblocked; "D" - Doors unblocked, unlocked *and* clear].

with other industry members lessons learned about the programs and safety initiatives being implemented pursuant to the Agreement.

- iii. To the extent available and used, Respondents shall also make the findings, slides, and/or outlines of the aforesaid presentations available to the trade association or industry members for at least one year after the presentations occur.

(B) Associate Participation.

1. Hotline for Safety Concerns.
 - a. Maintain and communicate a 24/7 Hotline for receiving safety complaints.
 - b. Will track calls to hotline and analyze for trends related to the overall safety and health management system and to OSHA compliance.
2. Safety Incentive Program.
 - a. Develop a store-level safety and health recognition program based on criteria such as leading indicators and actions to prevent hazards relevant to the settlement agreement.
3. Safety Advisory Group.
 - a. Establish Safety Advisory Group composed of, at minimum, 15 (fifteen) employees.
 - b. The Safety Advisory Group will be comprised of a range of field leaders and employees, the Director of EH&S, and the Manager of Store Safety.
 - c. The primary purpose of the Safety Advisory Group is to analyze store safety compliance issues and advise on opportunities to improve same.

(C) Hazard Identification.

1. Challenged Store Identification.
 - a. Develop method of proactively identifying stores that are or could be particularly challenged in complying with OSHA regulatory requirements relating to clear and unobstructed exit routes, exit doors, electrical panels, and fire extinguishers, and safe stacking (hereinafter referred to as "Challenged Stores").
 - b. Metrics used to identify Challenged Stores to be based on objective criteria and data, considering leading indicators, such as but not limited to square footage of backrooms, capacity and volume of sales, inventory per square foot, and low sales of high

selling merchandise.

- c. Implement enhanced hazard control plan elements for Challenged Stores until at least one year following the termination of this Agreement.
- d. Included among the group of Challenged Stores will be those that have higher volume sales but comparatively small backrooms (referred to as "LCHV Stores").

2. Safety Scorecard Development.

- a. Develop a scorecard based on a combination of leading and lagging indicators, such as number of employee complaints related to safety or hazards in store, number of OSHA inspections, history of non-compliance, number of audits completed, and amount of time of vacancy of store management positions, (hereinafter referred to as "Safety Scorecard").
- b. Analyze Safety Scorecard on a monthly basis to assess trends in compliance with OSHA regulatory requirements.

(D) Hazard Control Plan.

- 1. Engineering Controls. Respondent will evaluate feasible engineering and administrative controls to ensure compliance with standards related to S.P.E.E.D., including but not limited to the following controls:
 - a. Shelf Extenders. Each LCHV Store shall be evaluated to determine whether Shelf Extenders would be useful to reduce hazards or to enhance regulatory compliance.
- 2. Administrative Controls.
 - a. S.P.E.E.D. signage shall be developed and disseminated to all stores nationwide.
 - b. Border Demarcation. Each LCHV Store shall be evaluated to determine if floors are appropriately painted or taped to demarcate doors, exit routes, and electrical panels, and for all stores without bright demarcations, painting or repainting of yellow lines (or equivalent taping) on floors around doors, exit routes, and electrical panels shall occur.
 - c. Nationwide Field Leadership Deficiency Notification.
 - i. Develop program for store management – through, by example, the Safety Hotline – to promptly notify the EH&S Department of any situation where store management needs additional support or resources to promptly address any safety issues.
 - ii. Manager of Store Safety (or designee) must promptly work with Store Operations to address the situation. If any

employee corrective actions may be needed, the Manager of Store Safety (or designee) shall report the situation to Human Resources for follow-up.

3. Enhanced Hazard Control Plan for Challenged Stores.
 - a. Conduct a full review and evaluation of the process and determinations made regarding the allocation and management of inventory to Challenged Stores.
 - b. Implement enhanced hazard control plan elements for Challenged Stores based on review and evaluation to include allocation adjustments, adjustments to labor provided, and improved coordination of truck deliveries and delivery schedules.

(E) Enhanced Corrective Action Program.

1. Develop matrix for employee Corrective Actions applied to safety violations.
2. Include identification of safety violations that will, if warranted by investigation, result in immediate termination.
3. Revise Corrective Action Policy to include new discipline policy (*see* training/education of field leadership under Training).

(F) Audit Program.

1. District Manager review of S.P.E.E.D. compliance upon every store assessment visit.
2. Backroom Camera S.P.E.E.D. Audits.
 - a. Approximately 2000 stores per month.
3. EH&S In-Person Corporate S.P.E.E.D. Audits.
 - a. Targeted in-person audits annually during tenure of Settlement Agreement.

(G) Training.

1. Nationwide S.P.E.E.D. Training.
 - a. Roll-out new electronic-based training on S.P.E.E.D. Awareness for all store associates and field leadership.
 - b. Refresher training to be conducted annually for the term of the Settlement Agreement.
2. New Corrective Action Program or other Employee Training.
 - a. Conduct training on new Corrective Action Program with all store associates and field leadership.
 - b. Training will include education employee rights under the OSH Act and employee rights under the OSH Act on non-retaliation for

protected activity.

3. New Hire Training.
 - a. All new hires shall be trained on all topics required by this Settlement Agreement within thirty (30) days of hire.
4. Field Leadership Training
 - a. Safety training at annual field leadership meetings.

(H) Safety and Health Program Evaluation.

1. Frequent review of Challenged Store metrics.
 - a. EH&S and Store Operations responsible for:
 - i. Weekly review of Challenged Store Metrics.
 - ii. Monthly review of Safety Scorecard to evaluate metrics, thresholds for inclusion and status of identified stores' S.P.E.E.D. status.
2. Evaluation of correlation between stores identified as Challenged Stores and stores that have historic OSHA or employee complaints or otherwise have been identified as having inadequate S.P.E.E.D. compliance; adjust metrics of Challenged Store identification as necessary based on evaluation.
3. Nationwide outreach on safety initiatives under Safety and Health Program.
 - a. Quarterly review with field leadership on Safety and Health Program effectiveness.