

**Advanced Drainage Systems**  
**U.S. In-Cab Driver Monitoring System Data Collection and Retention Policy**

Advanced Drainage Systems, Inc. and its affiliates in the United States (collectively, “ADS”) from time to time may put in place certain in-cab driver monitoring systems that collect, use, process, store, transmit, and otherwise handle certain data. (Hereinafter, such systems put in place by ADS sometimes are referred to as “ADS In-Cab Monitoring Systems” and such data collected by such ADS In-Cab Monitoring Systems sometimes is referred to as “In-Cab System Data”.) Such In-Cab System Data potentially may include Biometric Data (defined below).

**PURPOSES FOR COLLECTING IN-CAB SYSTEM DATA**

The purposes for collecting In-Cab System Data are to detect unsafe driving behavior, prevent potential safety events, provide coaching to drivers, obtain accurate information related to on-road incidents, evaluate and address employee, and non-employee, driver performance, and for other safety and security purposes. (Hereinafter, such purposes are referred to collectively as the “Purposes”).

**CONSENT**

No ADS employee, or non-employee driver, may operate (or be permitted to operate) a vehicle containing an ADS In-Cab Monitoring System without ADS first both (1) having provided to such individual a copy of this Policy and (2) subsequently having received back from such individual a fully-executed consent in the form of the attached Exhibit (the “Consent”). ADS may make an employee’s (or other individual’s) execution of such Consent a condition of such employee’s/individual’s employment or other engagement (as the case may be). Similarly, ADS may terminate or otherwise end the engagement of an employee or other individual who subsequently revokes such a Consent.

**HANDLING OF IN-CAB SYSTEM DATA**

ADS Logistics shall (and shall require relevant ADS vendors to) collect, use, process, store, transmit, protect, disclose, and otherwise handle all In-Cab System Data in a manner that (1) meets or exceeds applicable reasonable standards of care from within ADS’ industry, (2) is the same as, or more protective than, the manner in which ADS stores, transmits, and protects other confidential and sensitive information, and (3) otherwise is in compliance with applicable law.

During the first quarter of each calendar year, ADS Logistics is to conduct a formal In-Cab System Data purging process pursuant to which (subject to the below-listed exceptions and conditions) retained In-Cab System Data is to be disposed of where either (1) the retention of such In-Cab System Data is no longer necessary for any of the Purposes or (2) such In-Cab System Data relates to a former employee, or a former non-employee driver, who both (a) separated from ADS twelve (12) months or more prior to the April 1<sup>st</sup> immediately following the close of the purge period for that calendar year and (b) has provided no services to ADS since before April 1<sup>st</sup> of the calendar year immediately preceding the purge period. ADS Logistics (again, subject to the below-listed exceptions and conditions) also may conduct additional purges (i.e., purges beyond the annual first-calendar-quarter exercise described in the immediately preceding sentence) of In-Cab System Data that is no longer necessary for any of the Purposes; such additional purges may be carried out systematically or on an ad hoc basis.

- As is the case with any other records, In-Cab System Data should not be disposed of where and to the extent that legal counsel and/or Risk Management directs (by way of a litigation hold notice, record preservation notice, or otherwise) personnel to suspend the disposal of such records.
- As is the case with any other records, In-Cab System Data should not be disposed of to the extent required by applicable law (including but not limited to by virtue of a court order).

Effective date: May 1, 2026

## **DEFINITIONS**

As used in this Policy, “Biometric Data” means “biometric identifiers” and/or “biometric information”.

“Biometric identifiers” means retina or iris scans, fingerprints, voiceprints, or scans of the hand or facial geometry, and includes any “biometric identifier” as defined by applicable law.

“Biometric information” means information, regardless of how it is captured, converted, stored, or shared, based on an individual’s biometric identifier which is used to identify an individual, and includes any “biometric information” and any “biometric data” as defined by applicable law.

**EXHIBIT**

**Advanced Drainage Systems  
Consent to Collection of In-Cab System Data (U.S.)**

I have received from ADS (hereinafter defined) a copy of ADS' U.S. In-Cab Driver Monitoring System Data Collection and Retention Policy (the "Policy"), and I have read and familiarized myself with, and understand the information contained in, both the Policy and this Consent to Collection of In-Cab System Data (U.S.) ("Consent"). **I have been advised and understand that Advanced Drainage Systems, Inc. and its affiliates in the United States (collectively, "ADS") and ADS' vendors, including vendors of ADS In-Cab Monitoring Systems (as defined in the Policy) may collect In-Cab System Data (as defined in the Policy) for the Purposes (as defined in the Policy) and that such In-Cab System Data may include Biometric Data (as defined in the Policy).**

I understand that ADS currently has, or will be implementing, an In-Cab Monitoring System that includes a dual-facing camera equipped with software used to collect In-Cab System Data that includes video footage and associated information and data that enables the In-Cab Monitoring System to locate drivers within the cab and which may involve scans of a driver's facial geometry and the collection of certain other types of Biometric Data. I understand that the In-Cab System Data collected by this In-Cab Monitoring System is stored on cloud-based servers hosted by ADS and its select vendors and that ADS does not sell, lease, trade, or license In-Cab System Data.

I understand that In-Cab System Data may be stored in the United States and/or one or more other countries, and may be subject to the laws of those countries where such In-Cab System Data is stored (for example, where a third-party service provider operates internationally) and that, as a result, such In-Cab System Data may be disclosed in response to valid demands or requests from government authorities, courts, or law enforcement officials of such countries.

I understand that ADS will retain and dispose of In-Cab System Data in accordance with the Policy.

I understand that I may decline to allow the collection of In-Cab System Data. However, I understand that my consent to ADS' collection, use, processing, storage, disclosure, and other handling of In-Cab System Data, including Biometric Data, is a condition of my employment or engagement. I understand that I may decline or revoke this Consent at any time by notifying ADS in writing, but I also understand that doing so may disqualify or otherwise preclude my continuing employment or engagement by ADS.

By signing below, I acknowledge having been provided with sufficient information to provide informed consent, and I hereby consent to the collection, processing, storage, use, disclosure, and other handling of In-Cab System Data, including Biometric Data, by ADS as described in the Policy and in this Consent.

\_\_\_\_\_  
Signature

Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Employer: \_\_\_\_\_

Effective date: May 1, 2026