

Drug-Free Workplace

Owner	Human Resources
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Revision Number	6

1. Purpose

This policy establishes the Company position regarding use of illegal drugs and alcohol in the workplace and conforms with the Drug-Free Workplace Act of 1988.

2. Background

The use of illegal drugs and the use of illegal controlled substances violate federal and state laws. It also impairs judgment and leads to mistakes that could cause serious harm to employees, clients and the Company. The use of such substances will not be tolerated in the workplace. In addition to the basic Company policy against drug use, the Company is required by the Drug-Free Workplace Act of 1988 to establish a specific policy regarding drugs in the workplace. See GP-C-06, "Fitness for Duty" for further guidance.

For the purposes of this procedure, controlled substances include drugs, or the synthetic or generic equivalent of drugs, that are illegal under federal, state or local laws. They include, but are not limited to: marijuana, heroin, hashish, cocaine, hallucinogens, opiates, amphetamines and medications not prescribed for current personal medical treatment by an accredited physician, and other drug or drug-like substances, the sale, use or possession of which is unlawful.

3. Policy

The Company will not permit any of its employees or contract employees to possess, consume, distribute, purchase, manufacture or sell drugs on company premises or in the conduct of Company related work at off-site locations, or allow any employee to report to work or perform duties in an unfit condition after having ingested drugs or while under the influence of alcohol. Any employee who is in violation of this policy will be subject to disciplinary action up to and including discharge. In order to keep drugs out of the workplace, the Company will actively cooperate with the authorities in the prosecution of anyone possessing or distributing drugs on its property. In order to maintain a drug-free workplace, the Company reserves the right to enter any area of its facilities and to require employees to open items of personal property including packages, purses, and briefcases.

Where permitted by state law, the Company will comply with drug testing requirements submitted by clients as part of their contract, testing required by the Department of Defense under 48 CFR Part 223 Drug-Free Workplace Rules, and testing implemented within operating groups of the Company based on the type of services provided. Proposals for such operating group programs must be approved by Human Resources prior to implementation. Testing will be administered on the basis of job or group assignment and employees affected by drug testing requirements different than or in addition to the requirements of this procedure will be given notice

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prior to the start of any testing program. Employees who have been granted a security clearance will be subject to random testing administered by the Corporate Security Officer.

4. Procedure

4.1 Voluntary Treatment and Rehabilitation

An employee who voluntarily seeks treatment for chemical abuse, drug or alcohol dependency prior to work performance being adversely affected as a result of the dependency will not be subject to immediate termination of employment. The Company's Employee Assistance Program will provide confidential assessment, counseling, referral, education and follow-up for employees seeking treatment. Employees will be required to furnish evidence of commitment to recovery, including follow-up recommendations of treatment and provisions for aftercare. Employees who return from an authorized drug rehabilitation/ detoxification program will be tested for drugs before their return to work. Employees who refuse testing will be advised that they have not completed the rehabilitation program and will not be permitted to return to work. Employees who test positive upon their return from a drug rehabilitation program will be terminated for cause. Employees who return to their position after completing a drug rehabilitation program may be required to submit to random drug testing as part of their recovery process.

4.2 Screening and Testing Procedure

Company employees may be subject to verification of compliance with this policy by means of functional drug testing, urine screening, or other procedures in accordance with this policy. Testing fees will be billed to the appropriate business unit. Employees will be required to sign a Drug Testing Consent and Release of Liability Form prior to taking any drug test. A preliminary test using the EMIT (Enzyme Multiplied Immunoassay Technique) method will be conducted and if a positive test result is indicated, a GC/MS (gas chromatography/mass spectroscopy) test will be conducted to confirm the presence and the amount of the drug in the system. Testing lab procedures will be in accordance with state and federal requirements. A chain of custody will exist to ensure that records and test results are kept confidential and released only to Company personnel with a need to know. Employees who receive notification of a positive test result have the right to request a portion of their specimen be retested at their expense within 72 hours of the test date.

4.3 Testing Requirements

Refusal to submit to a drug or alcohol test in order to determine fitness for duty or compliance with contract requirements will be considered a violation of this policy and will result in disciplinary action up to and including termination.

4.4 Criminal Drug Statute Conviction Reporting

Employees are required, as a condition of employment, to notify the Company of any criminal drug statute conviction for a violation occurring in the workplace no later than five days after such conviction. The Company will notify the federal contracting agency within ten days after receiving notice of the conviction whether from the employee or from another source. Any employee so convicted will be subject to termination in accordance with this policy.

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4.5 Substance Abuse Awareness Program

The Company will provide continuing programs to inform employees of the dangers of substance abuse in the workplace and Company policy for maintaining a drug-free workplace. Information on the availability of substance abuse counseling and rehabilitation is available through the Employee Assistance Program.

5. Notifications

This Policy is posted on the Company Intranet. The Drug-Free Workplace Program is also covered in the new employee orientation program, and new employees are required to acknowledge in writing their agreement to comply with Company Policies, specifically including this Drug-Free Workplace Policy.