

# DRUG/ALCOHOL TESTING

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## A. Drug/Alcohol Testing

### 1. Applicants for Employment

All persons seeking employment will be advised of the Company's drug testing requirement. Those applicants who are under serious consideration for employment and who sign an appropriate authorization will be tested for the presence of drugs. Failure to pass such a test will render the applicant ineligible for hiring.

### 2. Employees – Testing Based on Reasonable Suspicion

Employees will be tested for the presence of drugs and/or alcohol if reasonable suspicion exists to indicate that their ability to perform their work or to work safely may be impaired. Such suspicion exists if at least two Company representatives (managers, supervisors, or others authorized to act in accordance with this policy) confirm that the employee is demonstrating any one or a combination of behaviors that suggest that drugs and/or alcohol may be present in the employee's system. (A Drug/Alcohol Checklist will be used to identify such behaviors.)

### 3. Testing Procedures

- a. If an employee is suspected of being drug or alcohol impaired and the determination is made to test, management will make arrangements for the employee to be immediately transported and/or escorted to the Company's nearest designated collection facility.
- b. The specimen will be collected at the Company's designated collection facility. If there is evidence of adulteration of the specimen, a second specimen may be requested. Failure to comply with such a request, or with other requests related to this policy, may be grounds for termination of employment. Appropriate precautions will be taken to ensure the integrity of the test specimen(s). For alcohol testing (performed in suspicion-based testing), the employee may be required to submit to a separate breath-alcohol test.
- c. For any alcohol or drug test, the individual will be required to provide photo ID and to sign an Employee Drug/Alcohol Testing Authorization Form authorizing his or her transport and/or escort to the Company's designated collection facility, the collection of bodily fluids and/or the administration of a breath-alcohol test, the testing of such fluids by a NIDA-certified laboratory, release to the designated Medical Review Officer (MRO) (a M.D. who reviews positive tests to determine if there is a legitimate prescription underlying the positive result) of results and/or medical records and other related documents indicating whether any controlled substances were present in the individual's system, and the reporting by the MRO of test results to appropriate Company personnel. Failure to give such authorization will subject the employee to immediate suspension without pay and termination of employment.
- d. Pending test results, the employee will be sent home. The Company may, in its discretion, ask the employee to undergo further medical or other evaluation to determine if there is a medical or other basis for the perceived behavior and if some form of treatment is appropriate.
- e. If the employee tests positive for drugs and/or alcohol at the levels set forth by the Company, he or she will be subject to immediate termination.
- f. An employee who refuses or fails to take a required suspicion-based test will be subject to immediate suspension. After a review of the situation the employee's suspension may be followed by termination of employment.

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## 5. Communication and Review of Test Results

Results of drug/alcohol tests will be kept confidential, as required by law, and will only be communicated by the testing facility as follows: (1) If the results are negative, management will be notified and will communicate the result to the employee; (2) In the event of a positive test, the results will be communicated to the Company's designated MRO for follow-up and communication to the appropriate individuals. Final test results will be communicated only to those who have a need to know.

## B. The Manager's Role

A manager who has a reasonable suspicion that drugs or alcohol have been or are being used in the workplace is responsible for protecting the safety of the workplace by seeing that any employee who appears to be impaired is sent for testing in accordance with this policy. In exercising judgment and taking action in this manner, the manager does not act alone but in concert with another person acting in an observational capacity. No manager is responsible for immediately terminating any employee, even an employee observed using drugs or alcohol at the workplace. A manager who believes that he or she has a reasonable basis for terminating an employee should initiate the process – which might involve drug/alcohol testing, placing the employee on administrative leave and processing any necessary paperwork.

## C. Changes to the Policy

The Company reserves the right to modify or amend its drug-testing policy at any time in its sole discretion. Nothing in this policy alters the Company's rights as an at-will employer, or its right to manage the workplace, discipline employees or take other employment-related actions as it sees fit.

Note: This policy is in addition to and separate from the Company's policy governing DOT-regulated drivers and the random drug testing policy.