

Western Spring Mfg.

DRUG FREE WORKPLACE PROGRAM

I. STATEMENT OF POLICY

INTRODUCTION

Today, millions of Americans struggle with substance abuse-related issues, both at home as well as in the workplace. Western Spring Mfg. values its employees and customers and recognizes the adverse effects that substance abuse—including the use of illegal drugs, the abuse of alcohol, and misuse of prescription drugs and over-the-counter medications—can have on the work environment. Employees who use drugs and abuse alcohol are less productive, less reliable, and pose a direct threat to the safety and wellbeing of others.

WESTERN SPRING MFG. has adopted a drug-free workplace policy to ensure the safest possible workplace, reduce accidents, and eliminate the costs associated with workplace substance abuse, as well as to comply with State and Federal requirements.

WESTERN SPRING MFG. will require all employees and job applicants to participate in, consent to, and comply with the provisions of this policy as a condition of employment and continued employment. For those who fail to cooperate fully with the terms and conditions of this policy, WESTERN SPRING MFG. will respond appropriately to address the situation promptly and directly. WESTERN SPRING MFG. will not tolerate substance abuse in the least degree.

AUTHORITY

Employees with questions or information pertinent to WESTERN SPRING MFG. Drug-Free Workplace Program should review **Section N** of this policy for the Name and contact information of persons with responsibility for administering WESTERN SPRING MFG.'s drug-free workplace program.

COVERAGE

Covered Employees

WESTERN SPRING MFG.'s drug-free workplace policy covers all part-time and full-time employees. Employees who are leased or subcontracted to clients may be required to submit to testing if it is a condition of a client's substance abuse program, provided such testing is within the parameters of any applicable State and federal laws.

Applicants

All job applicants also are covered by this policy inasmuch as WESTERN SPRING MFG. has extended a conditional offer of employment.

NON-DISCRIMINATION

In accordance with the Americans with Disabilities Act (ADA) and State law, WESTERN SPRING MFG. does not discriminate against any qualified individuals with a disability who are not currently using illegal drugs and who have either successfully completed rehabilitation or who may be currently participating in a supervised rehabilitation program and are no longer using illegal drugs. Individuals who are currently using illegal drugs are not protected under the ADA. A current disability of any kind, however, does not entitle an employee and/or job applicant to violate any provisions of this policy.

EDUCATION & TRAINING

To help employees and supervisors better understand the nature of the substance abuse problem and how it affects the workplace, as well as the terms and conditions of this policy, WESTERN SPRING MFG. makes available educational materials and training sessions on an as-needed basis. Please inquire with WESTERN SPRING MFG.'s Drug-Free Workplace Program administrator listed in **Section N** for more information.

II. DEFINITIONS

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| Accident | A covered accident is one that takes place during work time or on Company property and involves: 1) a fatality, or 2) a reportable injury (an injury that requires medical attention or results in lost work time), 3) damage to Company property, including vehicles owned or leased by WESTERN SPRING MFG. or being used for Company purposes, or 4) an incident that is reportable to workers compensation insurance. |
| Alcohol | Liquids containing ethyl alcohol (ethanol), including, but is not limited to, beer, wine, and liquor. |
| Alcohol tests | The analysis of a bodily specimen used to determine the presence and specific level of alcohol in a person's system. Methods of testing may include breath, saliva, and blood. |
| Alcohol use | The consumption of any beverage or mixture of beverages that includes alcohol. For purposes of this policy that can include any medication containing alcohol. |
| BAC | An abbreviation for blood alcohol content, a measurement of how much alcohol an individual has in his or her system. |
| Chain of custody | A systemized process involving a "custody & control form" (CCF) used to track the journey of a bodily specimen, usually urine, hair, or oral fluid, from the donor to a lab for analysis. |
| Company | WESTERN SPRING MFG. |
| Company property | Includes all buildings, parking lots, vehicles owned or leased by WESTERN SPRING MFG. or used for Company purposes, work facilities and plants, warehouses, equipment, or land used by WESTERN SPRING MFG. or its customers or suppliers. |
| Confirmation test | A second analytical process conducted following an initial or screening test for the purpose of confirming the result of the first test. In the case of alcohol testing, this would typically involve the use of an Evidentiary Breath Test (EBT) following a non-evidentiary breath or saliva screen. In the case of a drug test, it would typically involve the use of gas chromatography/mass spectrometry technology (GCMS). |
| Drugs | For a complete list of substances that are considered drugs under this policy see Section M . |

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| Drug paraphernalia | Any device used to assist in the use, transfer, manufacture or storing of illegal drugs or controlled substances. |
| Drug tests | The analysis of a bodily specimen, usually urine, hair, or oral fluid, to determine the presence and level of a drug or drugs in an individual's system. This included an initial screening test and if necessary, GC/MS confirmation testing. |
| Employee | Anyone employed by or contracted with WESTERN SPRING MFG. who is covered by workers' compensation insurance obtained by WESTERN SPRING MFG.. |
| Employer | WESTERN SPRING MFG. |
| Evidentiary Breath Test (EBT) | A device approved by the National Highway Traffic Safety Administration (NHTSA) for the testing of breath to determine the presence and level of alcohol in an individual's system. Devices approved by NHTSA appear on the agency's Conforming Products List (CPL). |
| Illegal drugs use | The illegal use of illicit drugs, prescription drugs, over-the-counter medications, alcohol, or any other substance (such as glue, aerosols, etc.) being used in a way other than in its intended manner. |
| Medical Review Officer (MRO) | A licensed physician certified to review laboratory drug test results. This individual must have knowledge of substance abuse disorders and the necessary training to evaluate a confirmed positive drug test result to verify the result. |
| Medications | Prescription and non-prescription substances obtained and used legally to combat illness and injury or for other therapeutic reasons. |
| POCT Testing | Point of collection testing using an instant result testing device utilizing either a urine or oral fluid specimen. |
| Reasonable suspicion | <p>If you suspect that an employee is using or has used drugs or alcohol in direct violation of WESTERN SPRING MFG. drug-free workplace policy. Such suspicion will be based on specific facts and inferences either observed by or made known to WESTERN SPRING MFG. supervisory personnel.</p> <p>Behavior that could prompt reasonable suspicion of drug or alcohol use in violation of WESTERN SPRING MFG.'s policy include, but are not limited to: observation of the use, possession or distribution of drugs; physical symptoms of drug or alcohol use; patterns of abnormal and erratic conduct such as increased absenteeism or tardiness, lack of proper work performance, and violations of Company safety and work rules; reckless or risky behavior; evidence of an effort to alter a drug or alcohol test; and involvement in a work-related accident.</p> |
| Refusal | <p>Refusal or refusing to cooperate with the terms and conditions of this policy includes, but is not limited to:</p> <p>a. Refusal to be tested.</p> |

- b. Failure to provide an adequate sample (urine, hair, oral fluid, blood, breath) without a valid medical excuse.
- c. Refusal to sign required paperwork (including, but not limited to, consent forms, acknowledgement forms, and chain of custody forms).
- d. Failure to show up at an assigned collection site to provide a urine, hair, or oral fluid (urine, blood, breath, or oral fluid in the case of an alcohol test) specimen.
- e. Failure to be reasonably available to be tested following an accident, and
- f. Switching, tampering with, or adulterating any specimen or sample collected under WESTERN SPRING MFG.'s policy for the purpose of testing for drugs or alcohol, or attempting to do so.

Safety-sensitive position

Occupations, as designated by WESTERN SPRING MFG., in which an employee's inability to safely function in his/her job could place the safety and health of the worker and/or others at risk.

Screening tests

An initial drug or alcohol test conducted to determine the presence and level of drugs and/or alcohol in an individual's system. A positive screening test will often be verified by conducting a confirmation test.

Under the influence

Drugs—for purposes of this policy, an employee or job applicant who produces a verified positive drug test result will be deemed to be under the influence of drugs. Also, any employee who is observed to be acting in a way that raises reasonable suspicion of drug use may be deemed to be under the influence of drugs.

Alcohol— for purposes of this policy, an employee who produces a confirmed positive alcohol test result will be deemed to be under the influence of alcohol. Any alcohol test that equals or exceeds a 0.04 blood alcohol content (BAC) will be considered positive. Also, any employee who is observed to be acting in a way that raises reasonable suspicion of alcohol use in violation of WESTERN SPRING MFG.'s policy may be deemed to be under the influence of alcohol.

Use(ing)

As pertains to drugs, alcohol, and medications; to drink, smoke, apply topically, inject, possess, solicit, distribute, dispense, manufacture or transfer. Exceptions to these rules regarding the definition of "use" will be allowed only with Management's written permission.

Work(ing)

Performing any activity under any conditions during any period that an employee is covered by the Employer's Workers' Compensation insurance (i.e., driving on duty, on call or performing any tasks as a part of employment duties; lease and contract employees included).

**Work time
SPRING MFG..**

Any time for which an employee is being paid or is representing WESTERN
This includes all breaks and mealtimes.

WESTERN SPRING MFG.

III. POLICY WORK RULES

A. DRUGS

Employees shall not use or be under the influence of drugs illegally at any time, whether working or not working. This includes the use of illegal drugs and the illicit use of prescription or over-the-counter drugs.

For purposes of this policy, an employee or job applicant who produces a verified positive drug test result will be deemed to have violated this Company's policy. Also, any employee who is observed to be acting in a way that raises reasonable suspicion of drug use may be deemed to be under the influence of drugs.

B. ALCOHOL

Employees shall not use or be under the influence of alcohol while working.

For purposes of this policy, an employee who produces a confirmed positive alcohol test result will be deemed to be under the influence of alcohol and to have violated this Company's policy. Any alcohol test that equals or exceeds a 0.02 blood alcohol content (BAC) will be considered positive. Also, any employee who is observed to be acting in a way that raises reasonable suspicion of alcohol use in violation of WESTERN SPRING MFG.'s policy may be deemed to be under the influence of alcohol.

C. MEDICATIONS

Employees shall not use or be under the influence of medications while working if the medications have the potential to alter or to adversely affect their judgment, motor skills, to induce sleepiness or to otherwise detract from their safe job performance. Prohibited use of prescription drugs includes exceeding the recommended prescribed dosage or using others prescribed medications.

Exceptions can, of course, be made in work areas and activities of decreased safety sensitivity where the potential for accident and injury is minimal and where the effect of the medication on the employee is judged to be no factor by medical authority. It must also be acceptable to management for the employee to continue work. Exceptions to this rule (**Section C**) will be made at least one level of supervision above the concerned employee's immediate supervisor. Employees will provide Human Resource with a copy of any prescription for medication they are/will be taking before beginning work; those sensitive to the disclosure of their use of certain medications may call or visit WESTERN SPRING MFG. official (see Name and telephone number in Section N) in charge of the Drug Free Workplace Program, in confidence, to resolve their unique work situation. A copy of the prescription will be held in the employee's file.

OTHER PROHIBITED CONDUCT

- Testing positive for drugs or alcohol.
- Bringing illegal drugs, alcohol (unless otherwise authorized), controlled substances or drug paraphernalia to work and/or storing illegal drugs, alcohol, controlled substances, or drug paraphernalia on Company property.

- Possessing, using, manufacturing, distributing, or attempting to distribute, selling or dispensing drugs or drug paraphernalia.
- Possessing, using, manufacturing, distributing, or attempting to distribute, selling or dispensing drugs or controlled substances off Company property that may adversely affect WESTERN SPRING MFG., the worker's job performance, or place at risk the safety and health of the worker or others.
- Being convicted of or entering a guilty plea to a criminal drug- or alcohol-related offense. Employees are required to notify WESTERN SPRING MFG. in writing within 5 days of a criminal substance abuse conviction or pleading guilty to a criminal drug or alcohol offense.
- Switching, tampering with, or adulterating any specimen or sample collected under WESTERN SPRING MFG.'s policy for the purpose of testing for drugs or alcohol, or attempting to do so.
- Disclosing information related to a drug or alcohol test and/or treatment referrals, and test results, except as required by this policy or by law.
- Failing to consent to, cooperate with, participate in, and/or successfully complete all recommendations or conditions set forth in an authorized substance abuse treatment program, including return-to-work and post-rehabilitation drug and alcohol testing.
- Refusing to cooperate with the terms and conditions of this policy. Failure to cooperate includes, but is not limited to:
 - a. Refusal to be tested,
 - b. Failure to provide an adequate sample (urine, hair, oral fluid) without a valid medical excuse,
 - c. Refusal to sign required paperwork (including, but not limited to, consent forms, acknowledgement forms, and chain of custody forms),
 - d. Failure to show up at an assigned collection site to provide a urine, hair, or oral fluid (urine, breath, or oral fluid in the case of an alcohol test) specimen,
 - e. Failure to be reasonably available to be tested following an accident, and
 - f. Switching, tampering with, or adulterating any specimen or sample collected under WESTERN SPRING MFG.'s policy for the purpose of testing for drugs or alcohol, or attempting to do so.

D. DRUG FREE WORKPLACE PROGRAM MONITORING (DRUG & ALCOHOL TESTING)

WESTERN SPRING MFG. reserves the right to drug and alcohol test job applicants and employees to achieve a safe and productive work environment. WESTERN SPRING MFG. will conduct drug and alcohol testing within the parameters of any applicable State and federal laws. WESTERN SPRING MFG. reserves the right to analyze bodily samples such as urine, hair, oral fluids, blood, or breath using scientifically valid methods and procedures.

WESTERN SPRING MFG. reserves the right to test for alcohol and any or all the substances listed in **Section M** of this policy using cut-off levels established by the Substance Abuse and Mental Health Services Administration (SAMHSA) and the U.S. Department of Health & Human Services (DHHS).

To measure the success of, and to aid in enforcing our Drug Free Workplace Program, the following types of drug screening tests will be administered to detect the presence of illegal drugs:

1. Pre-employment (post-offer) screening of job applicants as a condition of obtaining employment

2. Fitness for duty testing of employees who are required to undergo fitness for duty medical examinations.
3. Follow-up testing of employees who return to work following participation in a substance abuse rehabilitation program. These employees will be tested upon return to duty and periodically for up to two years (six times during the first year, three times during the second year).
4. Reasonable suspicion or for cause testing of employees who, by reliable evidence, or by their observed or reliably reported behavior, may be suspected of: (a) Using or being under the influence of drugs, alcohol or medications while working; (b) Tampering with a drug Name test or sample; (c) Involvement in, causing or contributing to a “covered accident.” All specimens must be provided by the employees as soon as possible but not later than 32 hours after the incident.

NOTE:

A covered accident is one that takes place during work time or on Company property and involves: 1) a fatality, or 2) a reportable injury (an injury that requires medical attention or results in lost work time), or 3) damage to Company property, including vehicles owned or leased by WESTERN SPRING MFG. or being used for Company purposes.

5. Under a random testing schedule, 50 percent of the workforce to be tested annually with six employees selected quarterly for random testing.

Notice of Drug Testing will be given on all vacancy announcements. In addition to testing illegal drugs, a test for the presence of alcohol may be administered because of the conditions stated in Section D.4. (a), (b) and (c) above. All specimens for alcohol testing must be provided by the employees as soon as possible but not later than 4 hours after the incident.

A copy of documentation supporting a reasonable suspicion drug and alcohol test will be completed within seven (7) days after testing, will be provided to the employee upon request, and will be retained confidentially by WESTERN SPRING MFG. for at least one (1) year.

WESTERN SPRING MFG. reserves the right to conduct drug testing in any of the following ways, including combinations of the following:

LAB-BASED TESTING

Testing for the presence of drugs will be performed by a laboratory certified by the federal government utilizing a urine, hair, or oral fluid specimen. All positive specimens from the initial screen will be confirmed at the lab using a different technique and chemical principal utilizing the initial sample to ensure the reliability and accuracy of the initial result. All test results will be reported to a Medical Review Officer (MRO) for verification prior to being transmitted to the employee and/or WESTERN SPRING MFG..

POINT OF COLLECTION (POCT TESTING)

Testing for the presence of drugs will be performed with point-of-collection (POCT), instant result testing device utilizing either a urine or oral fluid specimen. All positive specimens from the initial screen will be confirmed at a certified laboratory using gas chromatography/mass spectrometry (GC/MS) technology to ensure the reliability and accuracy of the initial result.

All confirmed results will be reported to a Medical Review Officer (MRO) for verification prior to being transmitted to the employee and/or WESTERN SPRING MFG..

ALCOHOL TESTING

Testing for the presence of alcohol will be conducted using an instant result testing device utilizing either breath or an oral fluid sample. Any alcohol testing device used will be from a list of approved devices issued by the federal government's Conforming Products List (CPL). Alcohol testing may also be conducted utilizing a blood sample (where permitted by law) and analyzed by a certified laboratory.

E. CONSEQUENCES FOR VIOLATIONS OF THE POLICY

Employees who violate any of the conditions of WESTERN SPRING MFG.'s Drug-Free Workplace Program are subject to discipline which may include termination of employment.

Each employee should understand that certain policy violations will result in immediate termination. Such violations of the policy include, but are not limited to:

- The use of alcohol on Company time, unless otherwise approved.
- The possession, sale or use of illegal drugs on Company premises or on Company time.
- Any effort to substitute or adulterate a drug test same or otherwise alter a drug test result; and
- Refusal to test when required as per this policy

Applicants who refuse to take testing which is requested under this policy or who test positive are subject to immediate withdrawal of the offer of employment.

The first time an employee tests positive on an instant result drug or alcohol test, regardless of the reason; random, post-accident or reasonable suspicion, the following steps will be taken:

1. The instant positive test kit is sealed, initialed, dated and shipped to lab for further testing and analysis.
2. Employee will be sent home immediately on an unpaid, non-disciplinary suspension (generally 3-5 days) until final lab report and MRO review is received.
3. Upon WESTERN SPRING MFG.'s receipt of a negative completed lab report and MRO review, employee will return to work, time off will be paid, and no further action taken.
4. Upon WESTERN SPRING MFG.'s receipt of a positive completed lab report and MRO review, employee will be required to submit to an assessment for treatment, counseling or rehabilitation and sign Rehabilitation Agreement, Last Chance Agreement or Return-to- Work Agreement.
5. **Within five working days after notice of the confirmatory test result, the employee or applicant must notify the employer in writing of his or her intention to obtain a confirmatory retest at his or her own expense. Within three working days after receipt of this notice, the employer must notify the original testing laboratory that the employee or applicant requested the laboratory to conduct the confirmatory retest or transfer the sample to another qualified laboratory. The original testing laboratory must ensure that the chain-of-custody procedures are followed during transfer of the sample to the other laboratory.**
6. **The employee has 3 working days after; MRO confirmation to the employee; and MRO report being e-mailed to EPD; to notify EPD of their intentions related to**

enrollment in a rehabilitation plan, all related requirements therein allowing the employee continued employment at EPD. If EPD does not receive this notification within the timeframe listed, EPD will consider this a “voluntary termination” from employment w/EPD. (EPD is WESTERN SPRING MFG. abbreviation)

7. Prior to returning to work, the employee must submit to a return-to-work drug and alcohol test (at employee's expense). A positive confirmed test during or after referral to a treatment or assistance plan may result in termination of employment.
8. The employee must provide WESTERN SPRING MFG. with documentation of the treatment or assistance plan.
9. In the event under this policy that an employee is required to seek treatment or an assistance plan, it will be at the employee's expense.
10. The employee will be required to have “unannounced” or “random” drug and/or alcohol tests (also at the employee's expense) for twenty-four (24) months following the return to work, six random tests will be done over the course of months one through twelve and three random tests over the course of months thirteen through twenty-four.

Any employee with a second positive confirmed test will face termination of employment.

Employees arrested, indicted, or convicted of violating Chapter 893 or any controlled substance laws who fail to notify WESTERN SPRING MFG. within five (5) days of the event and if this substance abuse policy was also violated, will be subject to discipline up to and including termination.

DILUTE SPECIMEN

If the MRO informs WESTERN SPRING MFG. that a negative test was dilute, WESTERN SPRING MFG. may take the following action depending on Company policy and/or guidance provided by the MRO:

(1) If the MRO directs that a recollection take place under direct observation (i.e., because the creatinine concentration of the specimen was equal to or greater than 2mg/dL, but less than or equal to 5 mg/dL), WESTERN SPRING MFG. will do so immediately.

(2) Otherwise (i.e., if the creatinine concentration of the dilute specimen is greater than 5 mg/dL), WESTERN SPRING MFG. may, but is not required to, direct the employee to take another test immediately.

NOTE: WESTERN SPRING MFG. will treat all employees the same for this purpose. WESTERN SPRING MFG. may, however, establish different policies for different types of tests (e.g., conduct retests in pre-employment situations, but not in random test situations). WESTERN SPRING MFG. will inform its employees in advance of its decisions on these matters.

When such a retest is required, the employee will be given the minimum possible advance notice that he or she must go to the collection site. The result of the retest will be considered the result, not the result from the first test.

If the employee declines to take a retest required because of a dilute specimen, the action will be

considered a “refusal to be tested” and will be treated the same as a confirmed and verified positive result.

RETURN TO EMPLOYMENT

Employees who leave WESTERN SPRING MFG. for substance abuse-related reasons, including being terminated for a positive drug and/or alcohol test, may reapply for employment after one year. Exceptions may be made to allow employees to reapply sooner than one year if they can provide documented proof that they have successfully completed a substance abuse treatment program approved by WESTERN SPRING MFG..

F. CHALLENGES TO CONFIRMED POSITIVE TEST RESULTS

Employees who are enrolled into an existing rehabilitation program and/or being tested for Randoms, post-accident, reasonable suspicion, et cetera, where the test results in a "non-negative" are accountable and responsible to meet the following requirements:

1. Supply the Medical Review Officer (MRO) proof of enrollment for the existing rehabilitation program (or #2)
 - a. In most cases, this will require a signed "Release of Information" by the employee through the rehabilitation center.
 - b. This proof of enrollment may be faxed from the rehabilitation center directly to the MRO.
2. Provide the prescription number no later than 3 business days.
 - a. If the employee has a prescription number, this number must be relayed to the MRO within 3 business days from the time the MRO has made their initial telephonic attempt to contact the employee.
 - b. It is highly advised that the employee answers their phone and has their voice mailbox set up. Having an inactive voice mailbox is not an acceptable excuse for not returning the MRO phone call.
 - c. Talk with your specimen collection specialist for any questions regarding the identity of the MRO's phone number.
3. Communication with your employer should be extended to inform them of your intent to return to work. Do not risk jeopardizing your employment.

An employee who has been notified by the MRO of a verified positive drug test or refusal to test because of adulteration or substitution, has 72 hours from the time of notification to request a test of the split specimen or retest of the original specimen. The request may be verbal or in writing. If the request is made directly to the MRO within 72 hours, it will trigger the test of a split specimen or retest of the original specimen. The employee will be responsible for the cost of the test of the split specimen or for the cost of the retest of the original specimen.

If, as an employee, you have not requested a test of the split specimen or retest of the original specimen within 72 hours, you may present to the MRO information documenting that serious injury, illness, lack of actual notice of the verified test result, inability to contact the MRO (e.g., there was no one in the MRO's office and the answering machine was not working), or other circumstances unavoidably prevented you from making a timely request.

If the MRO concludes from the employee's information that there was a legitimate reason for the employee's failure to request the test of the split specimen within 72 hours, the MRO must direct that the test of the split specimen take place, just as if there had been a timely request.

When the employee makes a timely request for a test of the split specimen or a retest of the original specimen; the MRO will immediately provide written notice to the laboratory that tested the primary specimen, directing the laboratory to forward the split specimen or portion of the original

specimen to a second SAMHSA certified laboratory. The MRO will document the date and time of the employee's request and report to WESTERN SPRING MFG. whether the test confirmed the presence of the drug.

G. CONFIDENTIALITY OF DRUG TESTING INFORMATION

All written reports and related information received by WESTERN SPRING MFG., laboratories, employee leasing programs, drug and alcohol rehabilitation programs and their agents will be held in strictest confidence and will not be disclosed except in accordance with Statutes or otherwise legally disclosed. Release of such information under any other circumstance shall be solely pursuant to a written consent form signed voluntarily by the person tested. Information on drug test results shall not be released or used in any criminal proceeding against the employee or job applicant.

Agents of our Company and the laboratory conducting a drug test will, however, have access to drug test information when consulting with legal counsel in connection with actions brought against them when the information is relevant to its defense in a civil or administrative matter.

H. CONFIDENTIAL REPORTING OF MEDICATION USE

WESTERN SPRING MFG. knows that eventually most people need to take medications to combat various illnesses. Employees must realize, however, that many medications will alter or affect a drug test. An employee could possibly test positive for a drug when taking medications prescribed by a doctor or bought over the counter at a pharmacy. Medications known to alter or affect a drug test are listed in **Section M**. The name of the testing laboratory is listed in **Section N**. Employees who want more technical information about medications may consult the testing laboratory.

To avoid the potential problems created by a false test result, the MRO will contact the employee regarding all positive results to determine the use of medications. You may list the use of medications on the back of your copy of the chain of custody form after your specimen is collected and discuss use of medications only with the MRO. The only prescription drugs considered allowable if found in a drug test are those used prescribed to the individual under the supervision of a doctor.

I. EMPLOYEE ASSISTANCE PROGRAM

WESTERN SPRING MFG. maintains an Employee Assistance Program (EAP) that consists of referring employees and their families who suffer from alcohol or drug use problems to local drug and alcohol rehabilitation centers. The telephone directory yellow pages, under "Drug Abuse and Addiction - Information and Treatment", list the names and locations of treatment centers. Also, the United Way, listed in the telephone directory white pages, offers many confidential services at no charge. Any costs of outside services are, however, the employee's responsibility. There may be options for additional EAP services under an employee's Company policy and/or health insurance coverage.

Any employee who has not previously tested positive for drug or alcohol use and has not yet entered a drug and/or alcohol abuse rehabilitation program, may seek assistance for drug and alcohol problems before they lead to disciplinary actions.

No employee will be discharged, disciplined, or discriminated against solely upon the employee's positive for drug use, entered an employee assistance program for drug related problems, or entered an alcohol and drug rehabilitation program.

Through the EAP, WESTERN SPRING MFG. will attempt to provide appropriate referral to drug and alcohol abuse rehabilitation programs.

If an employee wishes to pursue help through the EAP, please contact the person listed in **Section N** for appropriate referral. In addition, **Section O** lists national hotline numbers and other resources for drug and alcohol problems.

J. THIS SECTION INTENTIONALLY LEFT BLANK

K. FEDERAL AND STATE LAWS AND REGULATIONS

Nothing in this statement of policy shall be presumed to override, amend, or change any requirements of State and/or Federal law. In the event any of the provisions of this policy conflict with applicable laws and regulations, such laws and regulations will be deemed to control. Additional State laws governing this policy may be listed in the Appendix.

L. AMENDMENT AND SEVERABILITY

WESTERN SPRING MFG. reserves the right to administer this policy, and interpret, change, or rescind the policy in whole or in part, with or without notice or consideration. In addition, changes to applicable State and federal laws or regulations may require WESTERN SPRING MFG. to modify or supplement the policy.

The policy does not create an employment contract and should not be interpreted or considered as such. This policy does not, in any way, change the nature of the at-will employment relationship on either the part of the employee or WESTERN SPRING MFG..

M. SUBSTANCES WHICH COULD ALTER OR AFFECT THE OUTCOME OF A DRUG TEST

(BRAND NAMES AND COMMON NAMES)

1. **AMPHETAMINES:** Albuterol, Biphetamine, Desoxyn, Dexedrine, Didrex
2. **CANNABINOIDS:** Marinol (Dronabinol, THC), Marijuana, Hash Pot
3. **COCAINE:** Cocaine HCl topical solution (Roxanne), Crack, Coke
4. **PHENCYCLIDINE:** Not legal by prescription; PCP, Angel Dust
5. **OPIATES:** Paregoric, Parepectolin, Donnagel PG, Morphine, Tylenol with Codeine, Empirin with Codeine, APAP with Codeine, Aspirin with Codeine, Robitussin AC, Guaiatuss AC, Novahistine DH, Novahistine Expectorant, Dilaudid (Hydromorphone), M-S Contin and Roxanol (morphine sulfate), Percodan, Vicodin, Lortab, (Hydrocodone) Opium, Morphine, Heroin
6. **METHAQUALONE:** Not legal by prescription
7. **BARBITURATES:** Phenobarbital, Tuinal, Amytal, Nembutal, Seconal, Lotusate, Fiorinal, Firoicet, Esgic, Butisol Mebaral, Butabarbital, Butabital
8. **METHADONE:** Dolphine, Methadose
9. **BENZODIAZEPINES:** Ativan, Azene, Clonopin, Dalmane, Diazepam, Librium, Xanax, Serax, Tranxene, Valium, Verstran, Halcion, Paxipam, Restoril, Rohypnol and Centrax
10. **PROPOXYPHENE:** Darvocet, Darvon N, Dolene, Etc.
11. **ALCOHOL:** Liquid medications containing ethyl alcohol (ethanol). Please read the label for alcohol content. As an example, Vick's Nyquil is 25% (50 proof) ethyl alcohol; Comtrex is 20% (40 proof); Contac Severe Cold Formula Night Strength is 25% (50 proof) and Listerine is 26.9% (54 proof); Booze, Drink

Other Drugs which may or may not be listed above:

| | | |
|--|--|--|
| Meperidine (Demerol) Quinine Methamphetamine, Meth Hydromorphone (Dilaudid) Phenothiazines Phenmetrazine (Preludin) Pentazocine (Talwin) Amitriptyline/Nortriptyline (Elavil) Ecstasy, MDMA/MDA Fentanyl | Phenobarbital Imipramine/Desipramine Hydroxyzine (Vistaril) Doxepin (Sinequan/Adapin) Hydrocodone (Hycodan) Phentermine Meperidine Other Barbiturates (specific identity not differentiated, includes: Amobarb, Pentobarb, Secobarb, Butalbital, etc.) | Diazepam (Valium) Ativan and/or Dalmane Clonazepam (Klonopin) Meprobamate (Equanil) Glutethimide (Doriden) Ethchlorvynol (Placidyl) Fenfluramine Tramadol Other Benzodiazepines (specific identity not differentiated, Includes: Librium, Larazepam) |
|--|--|--|

WESTERN SPRING MFG.

N. DRUG FREE WORKPLACE POLICY - INFORMATION AND REVISION SHEET

THIS INFORMATION AND/OR REVISION NUMBER I DATED: 8/15/2022

Program Administrator:

Company Location:

Company Administering Your Drug Testing Program:

**OnSITE Drug Testing & Consulting
Phone: 651-274-1756**

Your Drug Testing Laboratory is

Medtox Lab

Your BAT Alcohol Testing Laboratory is:

Lifeloc

Your Collection Site is:

**OnSITE
70 County Road C #702
Little Canada, MN 55117**

Your Drug Testing MRO is:

Your Alcohol Testing MRO is:

Employees may also speak with WESTERN SPRING MFG. representative identified above for additional Employee Assistance Program (EAP) information. **Section O** also lists resources for drug and/or alcohol treatment and assistance programs.

60 DAY NOTICE TO APPLICANT AND EMPLOYEES OF DRUG FREE WORKPLACE PROGRAM

This notice is given on _____. Drug testing may begin 60 days after the date of this notice.

Employee Education Program for the Drug Free Workplace

(This first page to be signed and returned to your supervisor)

Workplace accidents and lack of productivity as the result of substance abuse threaten the wellbeing of employers, employees, and our communities. To safeguard our workplace against the disastrous effects of substance abuse, this company has developed a Drug Free Workplace Program.

The Drug Free Workplace Program is a constructive means for management and employees to work together to maintain a safe, productive, drug free environment. The following is a short drug and alcohol awareness program designed to help you the employee understand the importance of this company's Drug Free Workplace Program. In addition, it is important that you understand the legal, social, physical, and emotional consequences of the misuse of alcohol and/or drugs.

Please carefully review the attached information. If you have questions or concerns, please immediately contact your supervisor. Upon completion of your review of the attached materials, please complete the section below and return it to your supervisor.

I hereby acknowledge receipt of WESTERN SPRING MFG. Drug Free Workplace educational material. I have previously read, and I understand WESTERN SPRING MFG.'s Drug Free Workplace Policy.

WESTERN SPRING MFG.

Employee Signature

Employee Name

Date

Supervisor Signature

Supervisor

Date

WESTERN SPRING MFG.

PRE-EMPLOYMENT DRUG TESTING POLICY

All job applicants at this Company will undergo screening for the presence of illegal drugs as a condition for employment.

Applicants will be required to voluntarily submit to lab-based or Point-of-Collection urine, hair, or oral fluid test at WESTERN SPRING MFG.'s sole discretion, and by signing a consent agreement, will release WESTERN SPRING MFG. from liability.

Any applicant with a positive test result, or who adulterates or substitutes a test sample or who attempts to do so, will be denied employment at that time. Any applicant who refuses to be tested or to provide a sample to be tested will be denied employment at that time.

WESTERN SPRING MFG. will not discriminate against applicants for employment because of past abuse of drugs or alcohol. It is the current abuse of drugs or alcohol, which prevents employees from properly performing their jobs that WESTERN SPRING MFG. will not tolerate.

PRE-EMPLOYMENT AGREEMENT

PLEASE READ CAREFULLY

I freely and voluntarily agree to submit to a drug test as part of my application for employment. I understand that either refusal to submit to a drug test or failure to qualify according to the minimum standards established by WESTERN SPRING MFG. for this drug test might disqualify me from further consideration for employment.

I further understand that upon commencement of employment with WESTERN SPRING MFG., I may again be required to submit to a test of my urine, hair, or oral fluid. I understand that refusal to take a requested drug test or failure to meet the minimum standards set for the drug test may result in immediate suspension or termination.

If employment commences prior to WESTERN SPRING MFG. receiving the drug test results, I understand that I will be immediately terminated if the result comes back positive, adulterated, or substituted. I understand that a negative drug test result is required for consideration for permanent employment.

I have read in full and understand the above statements and conditions of employment.

Applicant's Signature

Date

Driver License Information:

State: _____ DL # _____

WESTERN SPRING MFG.
Drug Free Workplace Program

Employee Name _____

ID Number _____

DOCUMENTATION OF BASIS FOR REASONABLE SUSPICION TESTING

Prepare within 7 days after all testing for reasonable suspicion, give to employee upon request, and keep confidential for at least one year.

Date of testing for reasonable suspicion _____.

Circumstances, which existed to warrant the testing done for reasonable suspicion, were as follows:

- _____ A report of drug use, provided by a reliable and credible source, which has been independently corroborated.
- _____ Evidence that an individual has tampered with a drug test during his employment with the current employer.
- _____ Information that an employee has caused, contributed to, or been involved in an accident while at work.
- _____ Evidence that an employee has used, possessed, sold, solicited, or transferred drugs while working or while on the employer's premises or while operating the employer's vehicle, machinery, or equipment.
- _____ Observable phenomena while at work, such as direct observation of drug use or of the physical symptoms or manifestations of being under the influence of a drug or alcohol.
- _____ Abnormal conduct or erratic behavior while at work or a significant deterioration in work performance.

Additional Comments:

Date

Employer Signature

O. NATIONAL HOTLINE NUMBERS

Employee Assistance Program

The following organizations and resources provide free, confidential assistance to individuals who have, or know someone who has, a problem with alcohol or other drugs.

Substance Abuse Treatment Locator www.findtreatment.samhsa.gov

Phone: 1-800-662-4357 / 1-800-662-9832 (Española) / 1-800-228-0427 (TDD)

This Substance Abuse and Mental Health Services Administration (SAMHSA) Web site and toll-free phone line help individuals locate drug and alcohol abuse treatment programs in their communities.

Other National Hotlines & National Assistance Groups:

| | |
|---|----------------|
| Drug & Alcohol Abuse Hotline | 1-800-252-6465 |
| Drug Addiction Referral Hotline | 1-800-758-5877 |
| Alcoholics Anonymous | 1-800-344-2666 |
| Narcotics Anonymous | 1-818-773-9999 |
| AL-ANON Family Group Headquarters | 1-800-356-9996 |
| Child Help's - National Child Abuse Hot Line | 1-800-422-4453 |
| M.A.D.D. | 1-800-438-6233 |
| S.A.D.D. | 1-508-481-3568 |
| Families Anonymous | 1-800-736-9805 |
| Florida Alcohol and Drug Abuse Association | 1-850-878-2196 |
| National Runaway Switchboard | 1-800-621-4000 |
| National Institute on Drug Abuse (NIDA) | 1-301-443-1124 |
| National Suicide Prevention Lifeline | 1-800-273-8255 |
| National Council on Alcoholism & Drug Dependence Hopeline | 1-800-622-2255 |
| National Clearing House for Alcohol & Drug Information | 1-800-729-6686 |

Employees may also speak with WESTERN SPRING MFG. representative identified in **Section N** for additional Employee Assistance Program (EAP) information.

WESTERN SPRING MFG.

HELPLINES FOR EMPLOYEES

The following organizations and resources provide free, confidential assistance to individuals who have, or know someone who has, a problem with alcohol or other drugs.

Substance Abuse Treatment Locator

www.findtreatment.samhsa.gov Phone: 1-800-662-HELP

This Substance Abuse and Mental Health Services Administration (SAMHSA) Web site and toll-free phone line help individuals locate drug and alcohol abuse treatment programs in their communities.

Al-Anon/Alateen

Phone: (888) 4AL-ANON www.al-anon.alateen.org

Al-Anon provides information on the effects of alcohol abuse and refers friends and families of alcohol abusers to nearby support groups. Al-Anon's purpose is to help families and friends of alcoholics recover from the effects of living with the problem drinking of a relative or friend. Alateen is the organization's program for young people whose lives have been affected by someone else's drinking.

Alcoholics Anonymous (AA)

Phone: (212) 870-3400 www.aa.org

AA offers a way to stop drinking to individuals who feel they have a problem with alcohol. AA groups are in most cities and rural communities through the country. Look up "Alcoholics Anonymous" in a local telephone directory for a contact in your area.

American Council on Alcoholism

Phone: (800) 527-5344 www.aca-usa.org

This service provides referrals to alcoholism treatment programs nationwide and distributes written materials on alcohol abuse problems.

Nar-Anon

Phone: (800) 477-6291 www.nar-anon.org

This worldwide program provides support for friends and families of individuals with substance abuse problems.

Focus on Recovery Helpline

Phone: (800) 234-0420 www.focushealthcare.com

This helpline provides support and information for recovering drug addicts through referral to local helplines staffed by other recovering addicts.

National Council on Alcoholism and Drug Dependence Hopeline

Phone: (800) NCA-CALL www.ncadd.org

This organization, a planning and oversight agency for public substance abuse treatment programs, provides written information on alcohol and drug abuse and referrals to treatment and counseling services nationwide.

REFERRALS

Adult Children of Alcoholics

(ACA/ACoA)
P.O. Box 3216
Torrance, CA 90510
310-534-1815

Alanon/Alateen

Family Group Headquarters, Inc.
P.O. Box 862
Midtown Station
New York, NY 10018-0862
1-800-356-9996 (Literature)
1-800-344-2666 (Meeting Referral)

Alcoholics Anonymous

World Services, Inc.
475 Riverside Drive
New York, NY 10115
212-870-3400 (Literature)
212-647-1680 (Meeting Referral)

CDC National AIDS Hotline

1-800-342-AIDS

1-800-344-SIDA -- Spanish
1-800-AIDS-TTY -- TDD

Center for Substance Abuse Treatment

National Drug and Alcohol Treatment Referral
Service

1-800-662-HELP

Referrals To:

- 1-800-ALCOHOL
- 1-800-COCAINE
- 1-800-448-3000 BOYSTOWN

Children of Alcoholics Foundation, Inc.

555 Madison Avenue, 20th Floor
New York, NY 10022
212-754-0656 or 800-359-COAF

Cocaine Anonymous

World Service Office
3740 Overland Avenue, Ste. C
Los Angeles, CA 90034
1-800-347-8998

Families Anonymous

P.O. Box 35475
Culver City, CA 90231
1-800-736-9805

NAFARE Alcohol, Drug, and Pregnancy Hotline

200 N. Michigan Avenue
Chicago, IL 60601
1-800-638-BABY

Nar-Anon Family Group Headquarters, Inc.

P.O. Box 2562
Palos Verdes Peninsula, CA 90274
310-547-5800

Narcotics Anonymous (NA)

World Service Office
P.O. Box 9999
Van Nuys, CA 91409
818-773-9999

National Association for Children of Alcoholics

11426 Rockville Pike, Suite 301
Rockville, MD 20852
301-468-0985

National Clearinghouse for Alcohol and Drug Information

P.O. Box 2345
Rockville, MD 20847-2345
301-468-2600
1-800-729-6686

National Council on Alcoholism and Drug Dependence

12 West 21st Street, 7th Floor
New York, NY 10010
1-800-NCA-CALL (will refer you to your local
treatment information center)

National Families in Action

2296 Henderson Mill Road
Suite 204
Atlanta, GA 30345
770-934-6364

National Highway Traffic Safety Information

400 7th Street, SW
Washington, DC 20590
202-366-9550
Auto Safety Hotline: 1-800-424-9393

Hazelden Educational Materials

Pleasant Valley Road
P.O. Box 176
Center City, MN 55012-0176
1-800-328-9000

Marijuana Anonymous

World Services
P.O. Box 2912
Van Nuys, CA 91404
1-800-766-6779

Mothers Against Drunk Driving (MADD)

511 E. John Carpenter Freeway
Suite 700
Irving, TX 75062
214-744-6233
Victim Hotline: 800-438-6233 (GET MADD)

National Women's Health Network

514 10th Street, NW, Ste. 400
Washington, DC 20004
202-682-7814

Rational Recovery Systems

P. O. Box 800
Lotus, CA 95651
1-800-303-CURE

Secular Organizations for Sobriety (SOS)

P.O. Box 5
Buffalo, NY 14215
310-821-8430

Women for Sobriety

P.O. Box 618
Quakertown, PA 18951
1-800-333-1606