



DRUG & ALCOHOL POLICY

Commercial UAS Drone Services

CONNEXICORE DRUG AND ALCOHOL POLICY

POLICY STATEMENT: The purpose of this policy is to ensure public safety and to maintain a safe, and productive work environment for all Employees, Sub Contractors, and Customers by preventing accidents or other dangerous incidents that may result from drug or alcohol use. This policy pertains to all Employee, Sub Contractors and Associates of the company who have cause to be on company projects. The possession uses or sale of alcohol on company premises and customer properties is **strictly prohibited**. Further, the possession, use or sale of illegal drugs is prohibited at any time with a zero-tolerance policy.

Employees, Sub Contractors and Associates involved in **ANY** CONNEXICORE project are prohibited from reporting to work under the influence of alcohol or drugs. Employees, Sub Contractors and Associates who are taking a prescription drug is required to present to the company a statement from the prescribing physician that the prescription drug will not impair the Employee and Sub Contractor's work performance. The company will **require** drug testing of applicants for employment in safety-sensitive positions. Any applicant who refuses to submit to the test will **no longer be considered eligible for employment**. The company will require drug testing of Employees, Sub Contractors and Associates who hold safety-sensitive positions.

Drug testing shall be conducted in accordance with **DOT/USCG** rules and regulations. Specifically, individuals will be tested for the presence of controlled substances [marijuana, cocaine, opiates, amphetamines, phencyclidine (PCP) and alcohol] and will be subject to pre-employment, reasonable cause, periodic, random, and post-accident drug testing. Such individuals **MUST TEST NEGATIVE** for the presence of controlled substances.

In the interest of the safety and health of its Employees, Sub Contractors and Associates, the company reserves the right to inspect and search, at random, unannounced times, all packages, boxes, clothing or any personal belongings carried on or off company property.

Purpose

In compliance with the Drug-Free Workplace Act of 1988, CONNEXICORE has a longstanding commitment to provide a safe, quality-oriented and productive work environment. Alcohol and drug abuse pose a threat to the health and safety of CONNEXICORE Employees, Sub Contractors and Associates and to the security of the company's and customers equipment and facilities. For these reasons, CONNEXICORE is **committed to the elimination** of drug and alcohol use and abuse in the workplace.

Scope

This policy applies to all Employee, Sub Contractors and Associates as well as all applicants for employment of CONNEXICORE. The human resource (HR) department is responsible for policy administration.

Employee and Sub Contractors Assistance

CONNEXICORE will assist and support Employee and Sub Contractors who voluntarily seek help for drug or alcohol problems before becoming subject to discipline or termination under this or other CONNEXICORE policies. Such Employee and Sub Contractors will be allowed to use accrued paid time off, placed on leaves of absence, referred to treatment providers and otherwise accommodated as required by law. Employee, Sub Contractors and Associates may be required to document that they are successfully following prescribed treatment and to take and pass follow-up tests if they hold jobs that are safety-sensitive or require driving, or if they have violated this policy previously. Once a drug test has been initiated under this policy, unless otherwise required by the Family and Medical Leave Act or the Americans with Disabilities Act, the Employee and Sub Contractors will have forfeited the opportunity to be granted a leave of absence for treatment, and will face possible discipline, up to and including discharge.

Employee, Sub Contractors and Associates should report to work fit for duty and free of any adverse effects of illegal drugs or alcohol. This policy does not prohibit Employee, Sub Contractors and Associates from the lawful use and possession of prescribed medications. Employee, Sub Contractors and Associates must, however, consult with their doctors about the medications' effect on their fitness for duty and ability to work safely, and they must promptly disclose any work restrictions to their supervisor.

Work Rules

1. Whenever Employee, Sub Contractors and Associates are working, are operating any CONNEXICORE vehicle, are present on CONNEXICORE premises or are conducting company-related work offsite, they are prohibited from:
 - a. Using, possessing, buying, selling, manufacturing or dispensing an illegal drug (to include possession of drug paraphernalia).
 - b. Being under the influence of alcohol or an illegal drug as defined in this policy.
 - c. Possessing or consuming alcohol.
2. The presence of any detectable amount of any illegal drug, illegal controlled substance or alcohol in an Employee, Sub Contractors and Associates body system, while performing company business or while in a company facility, is prohibited.

3. CONNEXICORE will also not allow Employee, Sub Contractors and Associates to perform their duties while taking prescribed drugs that are adversely affecting their ability to safely and effectively perform their job duties. Employee, Sub Contractors and Associates taking a prescribed medication must carry it in a container labeled by a licensed pharmacist or be prepared to produce the container if asked.
4. Any illegal drugs or drug paraphernalia will be turned over to an appropriate law enforcement agency and may result in criminal prosecution.

Required Testing

Pre-employment

Applicants being considered for hire must pass a drug test before beginning work or receiving an offer of employment. Refusal to submit to testing will result in **disqualification** of further employment consideration.

Reasonable suspicion

Employee, Sub Contractors and Associates are subject to testing based on (but not limited to) observations by at least two members of management of apparent workplace use, possession or impairment. HR, the plant manager or the director of operations should be consulted before sending an Employee, Sub Contractors and Associates for testing. Management must use the **Reasonable Suspicion Observation Checklist** to document specific observations and behaviors that create a reasonable suspicion that an Employee, Sub Contractor or Associate is under the influence of illegal drugs or alcohol. Examples include:

- Odors (smell of alcohol, body odor or urine).
- Movements (unsteady, fidgety, dizzy).
- Eyes (dilated, constricted or watery eyes, or involuntary eye movements).
- Face (flushed, sweating, confused or blank look).
- Speech (slurred, slow, distracted mid-thought, inability to verbalize thoughts).
- Emotions (argumentative, agitated, irritable, drowsy).
- Actions (yawning, twitching).
- Inactions (sleeping, unconscious, no reaction to questions).

When reasonable suspicion testing is warranted, both management and HR will meet with the Employee, Sub Contractors and Associates to explain the observations and the requirement to undergo a drug and/or alcohol test within two hours. Refusal by an Employee, Sub Contractors and Associates will be treated as a positive drug test result and will result in immediate termination of employment

Under no circumstances will the Employee and Sub Contractors be allowed to drive himself or herself to the testing facility. A member of management must transport the Employee and Sub Contractors or arrange for a cab and arrange for the Employee and Sub Contractors to be transported home.

Post-accident

Employee, Sub Contractors and Associates are subject to testing when they cause or contribute to accidents that seriously damage a CONNEXICORE vehicle, machinery, equipment or property or that result in an injury to themselves or another Employee and Sub Contractors requiring offsite medical attention. A circumstance that constitutes probable belief will be presumed to arise in any instance involving a work-related accident or injury in which an Employee, Sub Contractors and Associates who was operating a motorized vehicle (including a CONNEXICORE forklift, pickup truck, overhead crane or aerial/man-lift) is found to be responsible for causing the accident. In any of these instances, the investigation and subsequent testing must take place within two hours following the accident, if not sooner. Refusal by an Employee, Sub Contractors and Associates will be treated as a positive drug test result and will result in immediate termination of employment.

Under no circumstances will the Employee and Sub Contractors be allowed to drive himself or herself to the testing facility. A member of management must transport the Employee and Sub Contractors or arrange for a cab and arrange for the Employee and Sub Contractors to be transported home.

Collection and Testing Procedures

Employee, Sub Contractors and Associates subject to alcohol testing will be transported to a CONNEXICORE-designated facility and directed to provide breath specimens. Breath specimens will be tested by trained technicians using federally approved breath alcohol testing devices capable of producing printed results that identify the Employee and Sub Contractors. If an Employee, Sub Contractors and Associates breath alcohol concentration is .04 or more, a second breath specimen will be tested approximately 20 minutes later. The results of the second test will be determinative. Alcohol tests may, however, be a breath, blood or saliva test, at the company's discretion. For purposes of this policy, test results generated by law enforcement or medical providers may be considered by the company as work rule violations.

Applicants and Employee and Sub Contractors subject to drug testing will be transported to a CONNEXICORE-designated testing facility and directed to provide urine specimens. Applicants and Employee and Sub Contractors may provide specimens in private unless they appear to be submitting altered, adulterated or substitute specimens. Collected specimens will be sent to a federally certified laboratory and tested for evidence of marijuana, cocaine, opiates, amphetamines, PCP, benzodiazepines, methadone, methaqualone and propoxyphene use. (Where indicated, specimens may be tested for other illegal drugs.) The laboratory will screen all specimens and confirm all positive screens. There must be a chain of custody from the time specimens are collected through testing and storage.

The laboratory will transmit all positive drug test results to a medical review officer (MRO) retained by CONNEXICORE, who will offer individuals with positive results a reasonable

opportunity to rebut or explain the results. Individuals with positive test results may also ask the MRO to have their split specimen sent to another federally certified laboratory to be tested at the applicant's or Employee, Sub Contractors and Associates own expense. Such requests must be made within 72 hours of notice of test results. If the second facility fails to find any evidence of drug use in the split specimen, the Employee and Sub Contractors or applicant will be treated as passing the test. In no event should a positive test result be communicated to CONNEXICORE until such time that the MRO has confirmed the test to be positive.

Consequences

Applicants who refuse to cooperate in a drug test or who test positive **will not** be hired and **will not be allowed** to reapply/retest in the future.

Employee, Sub Contractors and Associates who refuse to cooperate in required tests or who use, possess, buy, sell, manufacture or dispense an illegal drug in violation of this policy will be terminated. If the Employee, Sub Contractors and Associates refuses to be tested, yet the company believes he or she is impaired, under no circumstances will the Employee, Sub Contractors and Associates be allowed to drive himself or herself home.

Employee, Sub Contractors and Associates who test positive, or otherwise violate this policy, will be subject to discipline, up to and including termination. Depending on the circumstances, the Employee, Sub Contractors and Associates work history/record and any state law requirements, CONNEXICORE may offer an Employee, Sub Contractors and Associates who violates this policy or tests positive the opportunity to return to work on a last-chance basis pursuant to mutually agreeable terms, which could include follow-up drug testing at times and frequencies determined by CONNEXICORE for a minimum of one year but not more than two years as well as a waiver of the right to contest any termination resulting from a subsequent positive test. If the Employee, Sub Contractors and Associates either does not complete the rehabilitation program or tests positive after completing the rehabilitation program, the Employee, Sub Contractors and Associates will be **immediately discharged** from employment.

Employee, Sub Contractors and Associates will be paid for time spent in alcohol or drug testing and then suspended pending the results of the drug or alcohol test. After the results of the test are received, a date and time will be scheduled to discuss the results of the test; this meeting will include a member of management, a union representative (if requested), and HR. Should the results prove to be negative, the Employee, Sub Contractors and Associates will receive back pay for the times/days of suspension.

Confidentiality

Information and records relating to positive test results, drug and alcohol dependencies, and legitimate medical explanations provided to the MRO will be kept confidential to the extent required by law and maintained in secure files separate from normal personnel files. Such records and information may be disclosed among managers and supervisors on a need-to-know basis and may also be disclosed when relevant to a grievance, charge, claim or other legal proceeding initiated by or on behalf of an Employee and Sub Contractors or applicant.

Inspections

CONNEXICORE reserves the right to inspect all portions of its premises for drugs, alcohol or other contraband; affected Employee, Sub Contractors and Associates may have union representation involved in this process. All Employee, Sub Contractors and Associates and visitors may be asked to cooperate in inspections of their persons, work areas and property that might conceal a drug, alcohol or other contraband.

Employee, Sub Contractors and Associates who possess such contraband or refuse to cooperate in such inspections are subject to appropriate discipline, up to and including discharge.

Crimes Involving Drugs

CONNEXICORE prohibits all Employee, Sub Contractors and Associates, performing work under government contracts, from manufacturing, distributing, dispensing, possessing or using an illegal drug in or on company premises or while conducting company business. CONNEXICORE Employee, Sub Contractors and Associates are also prohibited from misusing legally prescribed or over the counter (OTC) drugs. Law enforcement personnel may be notified, as appropriate, when criminal activity is suspected.

CONNEXICORE does not desire to intrude into the private lives of its Employee, Sub Contractors and Associates but recognizes that Employee, Sub Contractors and Associates off-the-job involvement with drugs and alcohol may have an impact on the workplace. Therefore, CONNEXICORE **reserves the right** to take appropriate disciplinary action for drug use, sale or distribution while off company premises. All Employee, Sub Contractors and Associates who are convicted of, plead guilty to or are sentenced for a crime involving an illegal drug are required to report the conviction, plea or sentence to HR within five days. Failure to comply will result in **automatic discharge**. Cooperation in complying may result in suspension without pay to allow management to review the nature of the charges and the Employee and Sub Contractor's past record with CONNEXICORE.

Definitions

“Company premises” includes all buildings, offices, facilities, grounds, parking lots, lockers, places and vehicles owned, leased or managed by CONNEXICORE or any site on which the company is conducting business.

“Illegal drug” means a substance whose use or possession is controlled by federal law but that is not being used or possessed under the supervision of a licensed health care professional. (Controlled substances are listed in Schedules I-V of 21 C.F.R. Part 1308.)

“Refuse to cooperate” means to obstruct the collection or testing process; to submit an altered, adulterated or substitute sample; to fail to show up for a scheduled test; to refuse to complete the requested drug testing forms; or to fail to promptly provide specimen(s) for testing when directed to do so, without a valid medical basis for the failure. Employee, Sub Contractors and Associates who leave the scene of an accident without justifiable explanation prior to submission to drug and alcohol testing will also be considered to have refused to cooperate and will automatically be subject to discharge.

“Under the influence of alcohol” means an alcohol concentration equal to or greater than .04, or actions, appearance, speech or bodily odors that reasonably cause a supervisor to conclude that an Employee, Sub Contractors and Associates is impaired because of alcohol use.

“Under the influence of drugs” means a confirmed positive test result for illegal drug use per this policy. In addition, it means the misuse of legal drugs (prescription and possibly OTC) when there is not a valid prescription from a physician for the lawful use of a drug in the course of medical treatment (containers must include the patient’s name, the name of the substance, quantity/amount to be taken and the period of authorization).

DISCIPLINE: Employee, Sub Contractors and Associates found to be in violation of this policy by either directly possessing or using alcohol or drugs, as described above, or through a verified positive drug test or by court conviction, will be subject to immediate discharge from employment. Any Employee, Sub Contractors and Associates who fails to cooperate with the requirements set forth in this policy, including refusal to test, failure to provide a specimen within a reasonable time, failure to report for a scheduled appointment to provide a specimen or adulteration of a specimen, will be **subject to disciplinary action** which may include **immediate termination** of employment.

ADMINISTRATIVE: The company strictly prohibits the use, possession and/or sale of illegal drugs, drug paraphernalia or unsanctioned use of alcohol aboard company vessel(s) or property. The company will cooperate fully with public authorities in the prosecution of anyone in violation of said prohibition.

Information concerning drug and/or alcohol test results and information concerning violations of this policy will be treated as confidential information. Such information will be released only to management representatives who have a need to know. This information will also be provided to the Coast Guard or other federal and state agencies where required by law or regulation. Test results or documentation showing the employee has been subject to random drug testing shall be provided to that employee or to his/her designated representative, upon written request by the employee.

ALCOHOL AND DRUG POLICY ACKNOWLEDGMENT

I hereby certify that I have received a copy of CONNEXICORE Drug and Alcohol Policy and that I **fully understand** that violation of this policy will be grounds for **immediate termination** of my employment or sub-contractor status.

Employee, Sub Contractors, or Associate Signature

Date