



U.S. Drug & Alcohol Policy

PURPOSE

CURRENT is committed to the responsible conduct of its business and the safe operation of Company facilities. This policy is in compliance with the Drug Free Workplace Act of 1988.

The purpose of this Policy is to help assure the safety, security and performance by the Company by excluding alcohol and/or illegal drugs from the workplace, eliminating the use of illegal drugs by employees, to identify employees who exhibit the effects of such use/abuse and to commit appropriate resources to assist affected employees.

Employees are prohibited from engaging in or attempting to engage in the sale, use, possession, or transfer of alcohol, illegal drugs, unauthorized controlled substance, and/or contraband on Company property, customer property, while engaged in Company business, or while operating Company vehicles or equipment.

Employees are prohibited from reporting to work or performing their job duties in an unfit/impaired condition.

Employees who violate this policy will be subject to disciplinary action, up to and including discharge, as described in the Consequences section of this policy.

The Company reserves the right to amend or modify this policy at its sole discretion, in accordance with the requirements of applicable law, or for any other lawful reason.

SCOPE

This policy applies to all U.S. Employees on active payroll and post-offer candidates including interns, and pending new hire employees that enter Company premises, drive on Company business or represent the Company on client sites. This expectation is inclusive of any time an employee may be assigned as on-call or on standby.

Employees covered by a collective bargaining agreement are subject to the terms of that agreement. Where conflict exists between this policy and the collective bargaining agreement, the agreement will supersede this policy.

Employees who work at customer sites will have additional drug and alcohol testing requirements. The Company will require Suppliers who provide contractors to work on "Company Premises" or "Customer Site/Facility" to adopt similar requirements for their employees.

Employees will be subject to requirements of the country where they physically work.

PROGRAM ELEMENTS

This Policy includes the following elements:

Seeking Confidential Assistance for a Substance Abuse Issue

- Employees who use or misuse alcohol, illegal drugs, or Controlled Substances are strongly encouraged to seek treatment before the problem interferes with job performance or is discovered through the Company's request for testing.



Employees will not be subject to disciplinary action when they seek treatment on a confidential basis. Employees are still required to comply with this policy and will be subject to the disciplinary provisions of this policy if found to be in violation of the policy.

Disclosure of a Substance Abuse Issue to the Company

- Disclosure of drug and/or alcohol use and/or abuse by an employee to HR and/or management is a violation of the company policy and gives the Company grounds to test. Employees who disclose will be required to undergo appropriate evaluation and recommended treatment and comply with the terms and conditions of a safe return to work. Employees should understand that disclosure of a drug and/or alcohol abuse problem will be shared on an as needed basis with HR and other members of management to ensure that the employee can safely and compliantly return to work, if possible.
- Disclosure of drug and/or alcohol use by an employee at the time of or immediately prior to a drug and/or alcohol test will not be considered a self-disclosure/voluntary admission and cannot be used as a valid reason to avoid discipline.

Prescription Medication / Over-the-Counter Medication

- The Company recognizes an employee, under direction of a licensed health care professional, may need to use prescribed or over-the-counter medications. All prescriptions must be in the employee's name, must be legally valid based on local standards, and must be carried in the original container. Abuse or misuse of prescribed or over-the-counter drugs is strictly prohibited.
- The Company will not allow employees to perform their duties while taking prescribed or over the counter medications that may adversely affect their ability to safely and effectively perform their job duties. Employees are required to disclose to their Supervisor, HR, EHS or Global Health Services they are taking medication that may impact their ability to safely perform their job and be cleared to work while taking the medication. The Company may need to take other appropriate action to accommodate the employee, while an employee is using such medication.
- The details of the employee's medication and/or underlying medical condition is considered confidential and is not required to be disclosed.

Types of Drug & Alcohol Testing

The Company reserves the right to test any employee, for any illegal drug and/or prescription medication that is not being used for a clinical condition or as required by the Company's customers including but not limited:

- Amphetamines
- Barbiturates
- Benzodiazepines
- Cannabinoids (Marijuana Metabolite) (THC-COOH)
- Cocaine / Metabolites
- Methadone
- Methaqualone
- Opiates
- Phencyclidine (PCP)
- Propoxyphene



Acceptance of testing is a mandatory condition of employment. Refusal to cooperate in testing is a violation of this policy and will result in immediate termination of employment.

Employees are tested in the following situations, unless prohibited by federal, state, or local law:

Post-Offer, Pre-Employment

- As permitted under applicable law, all external candidates for employment with CURRENT will undergo a pre-employment drug and/or alcohol test.
- Internal candidates, including candidates from other brands who apply for safety-sensitive positions with the Company, or any Company facility or site may be required to undergo a post-offer, pre-employment drug and alcohol test, as permitted under applicable law and/or contract.
- All offers of employment shall be contingent upon the candidate's confirmed negative drug and/or alcohol test results.

Reasonable Suspicion

When management and/or a trained observer has as a good-faith, reasonable suspicion that an employee is under the influence, using, possessing, or distributing alcohol, an illegal drug, or a controlled substance, the employee must take a reasonable suspicion drug and/or alcohol test.

Post-Accident/Post-Incident

Any employee involved directly or indirectly in a workplace accident or incident that the Company reasonably believes is attributable to impairment, when it is determined that the incident could have been reasonably avoided under normal circumstances and/or the incident results in any of the situations listed below will be required to submit to a drug and/or alcohol test, unless restricted or prohibited by applicable law.

- Fatality
- Bodily injury requiring immediate medical treatment beyond first aid.
- Material property damage.
- "Near miss" that could have resulted in severe injury or material property.
- damage

Random

- All employees are subject to random drug and/or alcohol testing, unless restricted or prohibited by applicable law.
- The tests are unannounced, spread throughout the year, and the selection of employees is made by a scientifically valid method.
- Company employees selected for random drug and/or alcohol testing must report immediately for testing upon notification.



Return to Work and Follow Up

- Employees who have been or who are in a drug and/or alcohol rehabilitation program and who have been cleared to return to work by the treatment provider must have a negative drug and/or alcohol test prior to returning to work if a drug or alcohol rehabilitation program was mandated by the Company. Employees will also be enrolled in a follow-up drug and/or alcohol testing program.
- The Company retains the right to require a return-to-work drug and/or alcohol test prior to returning an employee following leave or a suspend status.

Customer-Required

- As permitted under applicable law, the Company will adhere to customer requirements for all drug and alcohol testing.
- In addition to the Company policy, employees who visit or perform services at customer premises or worksites must comply with the customer's drug and alcohol testing requirements before and during the employee's presence onsite.
- Employees who work at customer sites will have additional drug and alcohol testing requirements.

Drug and Alcohol Searches and Inspections

The Company may, from time to time and without further prior notice, conduct searches on Company premises and worksites including but not limited to, personal effects, desks, briefcases, locker, purses, baggage and vehicles. All employees are required to cooperate in the conducting of such searches as a condition of continued employment. When appropriate, items discovered through the Company's searches may be taken into custody and turned over to the proper law enforcement authorities. Employees may also be subject to criminal prosecution.

Alcohol Use at Company Functions

Employees may consume or possess alcohol provided by the Company at authorized Company functions or in certain legitimate business settings such as client entertainment. However, such employees are expected to act and drink responsibly (i.e. not to the point of becoming under the influence), if at all. Use of a designated driver, public or private transportation or other arrangements need to be made if there is any possibility that the employee, or a business guest, may be under the influence as the term is defined in this Policy.

PROGRAM PROCEDURES

US specific procedures are outlined in the US Drug & Alcohol Procedural guidelines document.

General Guidelines

- For Reasonable Suspicion and Post-Accident/Post-Incident investigation purposes, the Company requires an alcohol test to be administered within 8 hours and 32 hours for a drug test or as soon as practicable from the time the company confirms the facts of the reasonable suspicion.
- Until the negative drug and/or alcohol results of a pre-employment, post-accident, reasonable suspicion or return to work are confirmed, an employee may not work.



Medical or Legally Permitted Marijuana Use

Medical marijuana or legally permitted marijuana will not be accepted as an explanation, even where use of marijuana is permitted by state law, regulation or ordinance:

The Company complies with all applicable laws including both Federal and state laws. The use of marijuana for any purposes, even if permitted by state law, regulation or ordinance, will not be considered an acceptable explanation for a confirmed positive laboratory report for marijuana and will be reported by the MRO as a verified positive drug test for marijuana.

However, state law, regulations and ordinance requirements/limitations will be followed and a reasonable accommodation analysis will be conducted as applicable or as required by the federal Americans with Issue Date: September 25, 2017 Disabilities Act and any applicable state law, regulation, ordinance or case law/administrative decision precedent.

Collection, Testing, & Reporting Procedure

COLLECTION

- Employees identified for drug and/or alcohol screening pursuant to this policy will be referred to and evaluated at a collection site by a designated CURRENT Medical Representative.
- All specimen collection and substance abuse testing shall be performed in accordance with the standards set forth in the HHS certified laboratory and/or any applicable government regulations. (e.g., Department of Transportation Driver Testing procedures in the U.S.; 49CFR Part 40).
- It is recognized that performance of substance abuse testing under this policy, may, in certain locations, be limited by country, state or local regulations. Local management shall, in all instances, administer this policy in accordance with applicable local or state statutes or regulations.

TESTING

- The responsible approved collection site shall send collected specimens to a designated Department of Health and Human Services (HHS) approved laboratory in accordance with appropriate chain-of-custody procedures.
- The designated laboratory shall communicate the results of the tests to the responsible MRO. The MRO shall meet or otherwise directly communicate with each employee who tests positive for drugs in order to determine if an acceptable explanation can account for the positive result. If no such explanation is forthcoming, the MRO shall report the positive results to the Human Resource designee.

REPORTING

Based on operational structure, negative and positive drug and alcohol test results may be reported to any or all of those listed below:

- Human Resource Representative
- Employee's direct manager
- Employee



Non-Company Results

The Company reserves the right to utilize legitimate external test results for determining whether an employee has violated this policy. Including but not limited to law enforcement breathalyzer test, Customer conducted testing, hospital drug and/or alcohol results completed due to work related injury. Employees will be expected to support the gathering of this information.

Consequences

Refusal to Test

- Employees and external or internal candidates who refuse to submit to a drug and/or alcohol test, submits a falsified or adulterated specimen for testing as required by this policy or otherwise attempts to falsify a drug test under this Policy, will be considered to have a positive test result.
- Such employees will be subject to immediate termination, as permitted under applicable law.

Positive Test

- External or internal candidates who test positive for drug and/or alcohol use in a pre-employment drug and/or alcohol test shall not be eligible for employment with the Company for the subsequent 12-month period.
- Employees with a positive test will result in disciplinary action, up to and including discharge from employment with the Company, as permitted under applicable law.
- Employees who test positive on a drug and/or alcohol test and are terminated shall not be eligible for employment with the Company for the subsequent 12-month period.

DWI/DUI

DWI/DUIs incurred while driving a Company vehicle, during the scheduled workday or in the course of conducting Company business is not covered by this Policy.

Notification of Criminal Convictions

Employees are required to inform their manager and the Human Resources manager within five days of any conviction involving drugs. Conviction includes an adverse jury or judicial verdict, a guilty plea, or a plea of nolo contendere or 'no contest'.

Based on the circumstances of the conviction or deferred adjudication, disciplinary action may be imposed, up to and including termination.

Appeal Procedure

Any employee who believes that he/she has been adversely impacted by the Company's misapplication or misinterpretation of this policy may appeal his/her disciplinary action through existing appeal or dispute resolution procedures.

**Confidentiality**

Information and records relating to test results, drug and alcohol dependencies, medical restrictions, legitimate medical explanations provided to the MRO, and other medical information, shall be kept confidential and maintained in files separate from employees' personnel files. Such records and information may be disclosed to any person designated in writing by an applicant or an employee, to the MRO, to and among the Company's supervisors on a need-to-know basis, and where relevant to the Company's defense in a grievance, administrative proceeding, lawsuit or other legal proceeding, or as otherwise required or permitted by law.

Applicability

If any provision in this Policy is determined to be legally invalid or unenforceable by any court or agency of competent jurisdiction and that provision cannot be modified to be enforceable, the affected provision will be stricken, but the remaining provisions will remain unaffected and will continue to be applicable to all employees.

Acknowledgement and Consent

As a condition of continued employment, employees must complete, sign and return to the Company, the Acknowledgment of Receipt of CURRENT Drug and Alcohol Policy and Consent to Testing Form at the end of this Policy.