



SUBSTANCE ABUSE

IPIC is firmly committed to ensuring a safe, healthy, productive and efficient work environment for our Team Members, as well as our customers, and the public in general. The Company has a vital interest in ensuring a safe, healthy and efficient working environment and in preventing accidents and injuries resulting from the misuse of alcohol or drugs. The unlawful or improper presence or use of drugs or alcohol in the workplace presents a danger to everyone. For these reasons, the Company has established the following substance abuse and drug testing policy for Team Members. Compliance with the policy is required as a condition of continued employment with the Company. This policy applies to all Company Team Members, including Team Members in managerial or supervisory positions.

Current Types of Team Member Screening:

Reasonable Suspicion Testing:

“Reasonable Suspicion Testing” means drug and/or alcohol testing based on an employer’s belief that a Team Member is using or has used drugs and/or alcohol in violation of the employer’s policy, drawn from specific visual, or verbal facts that would lead a reasonable person, to conclude the possibility of drug and/or alcohol use.

Occurrences that may be indicators of substance abuse and are considered grounds for reasonable suspicion include, but are not limited to:

- Observable phenomena while at work, such as direct observation of drug use or the physical symptoms of manifestations of being under the influence of drugs and/or alcohol. Symptoms may include but are not limited to:
 - Odors (smell of alcohol/drugs, body odor, or urine)
 - Dilated, constricted, watery eyes, or involuntary eye movements
 - Slurred or slow speech
- Abnormal conduct or erratic behavior while at work or a significant deterioration in work performance.
- A report of drug use; provided by a reliable and credible source.
- Evidence that a Team Member has tampered with a drug/alcohol test during their

employment.

- Information that a Team Member has caused, contributed to, or been involved in an accident while at work with reasonable suspicion that drugs/alcohol may have been involved.
- Evidence that a Team Member 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.

If a Team Member is arrested for or convicted of a drug-related crime, the company will investigate all the circumstances, and company officials may utilize the drug-testing procedure if cause is established by the investigation. An arrest for a drug-related crime constitutes reasonable suspicion of drug use under this policy. As a condition of employment, a Team Member must notify the company's Human Resources Department of any criminal drug statute arrest or conviction within five (5) days of such arrest or conviction. The notification requirement applies whether the conviction resulted from conduct performed while in the course and scope of employment or off duty. The Company will take appropriate action within 30 days of notification of any drug-related arrests, convictions, and/or criminal charges.

Post-Accident Testing:

Any Team Member involved in a work-related accident, which requires medical treatment, above and beyond first-aid, must first receive treatment. Using a "reasonable basis" rule, where there is reason to believe, based on the circumstances and nature of an injury, that drugs and/or alcohol could have contributed to or caused the injury/accident, the Team Member must then submit to a post-accident drug and/or alcohol screen. The Team Member must complete the testing immediately or within two hours if immediately is not possible and testing must be completed on the date of injury. Failure to do so will be considered a refusal to test, resulting in immediate termination. Where applicable by law, a refusal to test may forfeit a Team Member's eligibility for medical and indemnity benefits under State Worker's Compensation Law in addition to forfeiture of unemployment benefits where applicable by law.

The substances that will be tested for are: Amphetamines, Cannabinoids (THC), Cocaine, Opiates, Phencyclidine (PCP), Alcohol, Barbiturates, Benzodiazepines, Methaqualone, Methadone and Propoxyphene. Testing for the presence of alcohol will be conducted by analysis of saliva. Testing for the presence of the metabolites of drugs will be conducted by the analysis of urine, blood or saliva.

Prohibited Conduct

Prohibited Conduct Concerning Alcohol and Drugs

The following conduct by Team Members is prohibited:

- (1) Reporting for work or remaining on duty after the Team Member has consumed alcohol.
- (2) Consuming alcohol at any time during a Team Member's workday. This includes, but is not limited to, while a Team Member is on or off the premises of the Company, as well as during the Team Member's meal and other break periods.

Exception: This prohibition does not include the authorized and reasonable consumption of alcohol by a Team Member of legal drinking age at functions or activities sponsored by the Company or a client. Responsible, professional, business-like behavior is expected of Team Members (including management) at all times. Inappropriate, unprofessional behavior associated with alcohol consumption may subject Team Members (including management) to disciplinary action, up to and including termination.

- (3) Engaging in any illegal or unauthorized use of drugs at any time while on or off-duty. This includes, but is not limited to, while a Team Member is on or off the premises of the Company, as well as during the Team Member's meal and other break periods.

This prohibition does not apply to prescription or over-the-counter medications taken by Team Members in safety-sensitive positions which:

- a) have been lawfully prescribed to, or obtained by, the Team Member; and
- b) are being used by the Team Member in accordance with the prescription's guidelines (if applicable); and
- c) before reporting to work under the influence of such medication, the Team Member has inquired whether the drug manufacturer or the Team Member's physician warns against driving, operating machinery or performing other work-related safety-sensitive tasks. If such warnings exist, the Team Member taking the medication must inform the Team Member's manager of restrictions before reporting to work under the influence of such substances. When informing the Team Member's supervisor(s) or the Human Resources Department of such restrictions, the Team Member should not identify the medication(s) being used or the reason for its use. The Company will evaluate and respond to this information on a case- by-case basis. Responses may include, among other

things, temporary job reassignment or modifications, a request for additional medical documentation and consultation, and/or an instruction that the Team Member not work until the restriction is removed. Any Team Member reporting to work in a safety-sensitive position without first advising the Company about warnings accompanying lawfully prescribed or obtained medications will be subject to disciplinary action up to and including possible termination of employment. A Team Member's lack of knowledge concerning such warnings will not excuse a violation of this rule where a Team Member has failed to make the inquiries required by this rule

Marijuana – including “medical marijuana” – is illegal under federal law and may not be used in the workplace. All Team Members are prohibited from being under the influence of marijuana while at work.

- (4) Failing to stay in contact with the Company or its medical review officer while awaiting the results of a drug test.
- (5) Engaging in the unlawful or unauthorized manufacture, distribution, dispensation, solicitation, sale, purchase, transfer or possession of drugs or alcohol while on Company-paid time, on Company premises, in Company vehicles, or while otherwise engaged in activities for or on behalf of the Company. This prohibition does not include the authorized distribution, dispensation, solicitation, sale, purchase, transfer or possession of alcohol at Company sponsored functions or activities. In addition, a Team Member's illegal conduct involving drugs or alcohol during non-work times may also result in discipline, up to and including discharge.
- (6) The refusal to submit to any drug or alcohol test that is required under the Company's policy is considered a positive test result and will result in the Team Member's immediate termination of employment for misconduct/Violation of the Company's Substance abuse policy, to the maximum extent permitted by applicable law. This includes tests which Team Members agree to take in conjunction with rehabilitation provided under the “Self- Identification of Substance Abuse Problem” section of this policy. An adulterated or diluted specimen, substitution of specimen with that from another person, refusal to sign required forms for drug test, or refusal to cooperate with testing procedures, will constitute a refusal to test and be subject to the same consequences of a positive result.

- (7) Testing positive on any drug or alcohol, with a result of 0.04 BAC or higher, test required under this policy and permitted by applicable law.

Consumption of Food or Food-Products Containing Hemp

The consumption of food and food-products containing hemp may cause a Team Member to test positive. A test result that is positive as a result of a Team Member's consumption of food or food-products containing or made from hemp or hemp products will be reported as a positive test and subject the Team Member to discipline, up to and including termination, to the maximum extent permitted by applicable law.

Prohibition on Team Member Working Under the Influence

No Supervisor or Manager who has actual knowledge that a Team Member has engaged in or is engaging in conduct prohibited under this policy shall permit the Team Member to work or continue working under such circumstances. Any Team Member who has been directed not to work or directed to stop working under such circumstances must immediately comply.

The Company maintains a policy of non-discrimination and will endeavor to make reasonable accommodations to assist recovering addicts or alcoholics and those having a medical history reflecting treatment for substance abuse conditions. We encourage Team Members to seek assistance before their drug and alcohol use renders them unable to perform their essential job functions or jeopardizes the health and safety of themselves or others. Additionally, Team Members may not request an accommodation to avoid discipline for a violation of the Substance Abuse Policy.

Searches:

Entering the Company's property constitutes consent to searches and inspections. If a Team Member is suspected of violating the Substance Abuse policy, the Team Member may be asked to submit to a search or inspection at any time. Searches can be conducted of pockets and clothing, lockers, wallets, purses, bags, desks, work stations, and equipment.

(1) Self-Identification of Substance Abuse Problem

Consistent with and subject to the Company's policies concerning the Family and Medical Leave Act, and personal leaves and vacations, Team Members who voluntarily self-identify themselves as having a drug or alcohol problem and who voluntarily request assistance for such problem will be referred to a substance abuse professional for an evaluation and for an appropriate counseling, treatment or rehabilitation program, if recommended. The cost of the evaluation and any counseling, treatment or rehabilitation is the Team Member's responsibility. (For further details concerning the Team Member's payment obligations, Team Members should refer to

their individual medical insurance plan.)

This request must be made before the Team Member is required to submit to a drug or alcohol test required by this policy and permitted by applicable law. Team Members may not use this self-identification provision to avoid taking a test when required under this policy or to avoid being disciplined for receiving a positive test result or for refusing to submit to a test.

Once leave commences, periodic certification that the Team Member is actively continuing to participate in the program, together with progress reports, shall also be required. To the maximum extent permitted by applicable law, as a further condition of taking such leave, the Team Member will be required to authorize the attending substance abuse professional to communicate directly with the Company, including to release the Team Member's relevant treatment records to the Company, except as federal or state law may otherwise require. All such oral and written communications between the substance abuse professional and the Company shall be treated as confidential.

Except where the federal or state law prohibits, all leave time taken for the evaluation, counseling, treatment or rehabilitation will be counted against the leave to which the Team Member may be entitled under the federal or state Family and Medical Leave laws, or other applicable leave policy, if any. In accordance with the applicable "Agreement for Voluntary Treatment and Conditions for Continued Employment" executed by the Team Member prior to the commencement of such leave, the Team Member may be required to submit to a return-to-duty drug test as a condition of returning to work and receive a negative result. The Team Member may also be required to submit to unannounced follow-up drug tests and/or unannounced follow-up alcohol tests as part of the program.

Confidentiality:

All information received by the Company through the drug and alcohol-free process is confidential communication. Access to this information is limited to those who have a legitimate need to know in compliance with applicable laws and Company policies.

Shared Responsibility:

A safe and productive drug and alcohol-free workplace is achieved through cooperation and shared responsibility. Both Team Members and management have important roles to play.

All Team Members are required to not report to work or be subject to duty while their inability to perform job duties is impaired due to on or off-duty use of alcohol or drugs. In addition, Team Members are encouraged to:

- Be concerned about working in a safe environment.
- Support fellow Team Members in seeking help.
- Report dangerous behavior to their supervisor

It is the supervisor's responsibility to:

- Inform Team Members of the drug and alcohol policy.
- Observe Team Member performance.
- Investigate reports of dangerous practices.
- Document negative changes and problems in performance.
- Counsel Team Members as to expected performance improvement.
- Clearly state consequences of policy violations.

This policy supersedes any information provided to applicants and/or Team Members, either written or oral. The Company reserves the right to change provisions of this policy and testing program at any time in the future.