

**DORAN & WARD PRINTING COMPANY'S DRUG AND ALCOHOL
ABUSE POLICY FOR A DRUG AND ALCOHOL FREE WORKPLACE
EFFECTIVE 1/20/06**

1. POLICY

- 1.1 Doran & Ward Printing Company has a vital interest in maintaining a safe, healthy, and efficient working environment. Being under the influence of a drug or alcohol on the job poses serious safety and health risks to the user and to all those who work with the user. The use, sale, purchase, transfer or possession of an illegal drug in the workplace, and the use, possession, or being under the influence of alcohol also poses unacceptable risks for safe, healthy, and efficient operations.
- 1.2 Doran & Ward Printing Company has the right and obligation to maintain a safe, healthy and efficient workplace for all of its team members, and to protect Doran & Ward Printing Company property, information, equipment, operations and reputation.
- 1.3 Doran & Ward Printing Company recognizes its obligations for the provisions of services that are free of the influence of illegal drugs and alcohol, and will endeavor through this policy to provide drug-and-alcohol free services.
- 1.4 Doran & Ward Printing Company further expresses its intent through this policy to comply with federal and state rules, regulations or laws that relate to the maintenance of a workplace free from illegal drugs and alcohol.
- 1.5 As a condition of employment, all team members are required to abide by the terms of this policy and to notify Doran & Ward Printing Company Human Resources and/or Management of any criminal drug statute conviction for a violation occurring in the workplace no later than five days after such conviction.

2. PURPOSE

- 2.1 This policy outlines the goals and objectives of Doran & Ward Printing Company drug and alcohol testing program and provides guidelines to team leaders/managers and team members concerning their responsibilities for carrying out the program.

3. SCOPE

- 3.1 This policy applies to all departments; all team members and all applicants who have been offered employment plus temporary agency team members.

4. DEFINITIONS

- 4.1 **Alcohol** means any beverage that contains ethyl alcohol (ethanol), and/or isopropanol, and/or methanol including but not limited to beer, wine, and distilled spirits.

- 4.2 **“Abuse” of legal drug** means any use of a legal drug, which impairs an individual’s faculties (other than use of a legal drug for appropriate purposes in accordance with applicable medical directions). In addition, the taking of a prescription drug that was prescribed for another shall be considered “abuse” of a legal drug.
- 4.3 **“Legal Drug”** means any prescribed drug or over-the-counter drug that has been legally obtained and is being used for the purpose for which prescribed and or manufactured.
- 4.4 **Illegal drug** means any drug which is not legally obtainable; any drug which is legally obtainable but has not been legally obtained; any prescribed drug not legally obtained; any prescribed drug not being used for the prescribed purpose; any over-the-counter drug being used at a dosage level other than recommended by the manufacturer or being used for a purpose other than intended by the manufacturer, and any drug being used for a purpose not in accordance with bona fide medical therapy. Examples of illegal drugs are cannabis substances, such as marijuana and hashish, cocaine, heroin, methamphetamine, phencyclidine (PCP), and so-called designer drugs and look-alike drugs.
- 4.5 **Contraband** means any article, the possession of which on Doran & Ward Printing Company premises or while on Doran & Ward Printing Company business causes a team member to be in violation of work rule or law. Contraband includes illegal drugs and alcoholic beverages, drug paraphernalia, lethal weapons, firearms, explosives, incendiaries, stolen property, counterfeit money, and pornographic materials.
- 4.6 **Company premises or company facilities** means all property of Doran & Ward Printing Company including, but not limited to, the offices, facilities and surrounding areas on Doran & Ward Printing Company owned or leased property, including Simpson Security Papers, parking lots and storage areas. The term also includes Doran & Ward Printing Company owned or leased vehicles and equipment wherever located.
- 4.7 **Reasonable suspicion means** a belief based on objective or subjective evidence sufficient to lead a prudent person to conclude that a particular team member may be unable to satisfactorily perform his or her job duties due to drug or alcohol impairment. Such inability to perform may include, but not be limited to, decreases in quality or quantity of the team member’s productivity, judgment, reasoning, concentration and psychomotor control, and marked changes in behavior. Accidents, deviations from safe working practices and erratic conduct indicative of impairment are examples of “reasonable suspicion” situations. Further, a report by a reliable and credible source of alcohol or other drug use creates “reasonable suspicion.”
- 4.8 **Under the influence** means a condition in which a person is affected by a drug or by alcohol in any manner. The symptoms of influence are not confined to those consistent with misbehavior, nor to obvious impairment of physical or mental ability, such as slurred speech or difficulty in maintaining balance. A determination of being under the influence can be established by a professional opinion, a scientifically valid test, such as urinalysis, saliva, skin, or by the opinion of a layperson.

- 4.9 **“Refusal to submit to a test”** means an individual will be deemed to have refused to submit to a test if he or she declines to consent to a test, fails to provide an adequate specimen or engages in any conduct which impairs, obstructs, or tampers with the testing process. Any individual refusing to submit to a test will be considered a presumptive positive and will be subject to the same disciplinary actions as anyone who submits to a test and tests positive.
- 4.10 **“Unable to produce a sample.”** An individual who initially cannot produce a sample for testing may consume up to 40 oz. of water and has up to three hours from initially being asked to produce a sample to do so. The individual may not leave the sight of the person performing the test during this time. If after this time frame the individual is still unable to produce a sample he or she will be considered a presumptive positive and will be subject to the same disciplinary actions as anyone who submits to a test and tests positive.
- 4.11 **“Sample”** means a sample from the human body capable of revealing metabolites, such as urine, saliva, or skin. “Sample” does not include blood [except in situations where a blood test was made on a team member involved in a workplace accident if the test was administered by or at the direction of a person providing treatment to the team member and the test was not made at the request of or by suggestion of management personnel].
- 4.12 **Prospective team member** means a person who has made written application to our company to become a team member.

5. EDUCATION

- 5.1 Team leaders and other management personnel involved with drug or alcohol testing are to be trained in:
- Detecting the signs and behavior of team members who may be using drugs or alcohol in violation of this policy
 - Intervening in situations that may involve violations of this policy
 - Recognizing the above activities as a direct job responsibility
 - Documentation and corroboration of team member alcohol or drug abuse
 - Referral of team members to resources regarding employee assistance programs
(Reference materials only)
- 5.2 Team members are to be informed of:
- the health and safety dangers associated with drug and alcohol use
 - the provisions of this policy
 - resources for employee assistance services through reference materials

6. WORK RULES

- 6.1 Legal Drugs
- A team member may bring to work and take a prescription drug(s) during work hours only if the Drug has been prescribed for the team member by a licensed medical provider and only if the drug(s) is/are taken in accordance with the licensed medical provider’s

directions. All prescription drugs **must** be kept in the original container in which they received from the pharmacy or other dispenser.

- b. A team member may bring to work and take over-the-counter medication during work hours only if the over-the-counter medication is used for its intended purposes and in accordance with package directions and any supplemental directions of the team member's treating medical provider. All over-the-counter medications must be kept in the original material (including the "box" or other material that contains warnings and cautions) in which they were received.
- c. A team member must notify either the Human Resources Coordinator or immediate team leader/manager whenever he or she is using a legal drug (i.e. a prescription drug prescribed for the team member or an over-the-counter medication) which potentially may affect safety or work-performance. In making this determination, the team member should rely on the warnings or cautions that are received with the particular lawful drug. Doran & Ward Printing Company does not seek information on all drugs that an individual may be taking, but only those where there is an indication that the drug may affect performance, or there is a caution that one should not engage in certain activities which are part of the team member's job duties while taking the drug. Doran & Ward Printing Company reserves the right to take appropriate action (including relieving team member from work) if the use of the drug is impairing or is deemed likely to impair the team member's faculties or work performance.
- d. Abuse of legal drugs will not be tolerated, and will be dealt with in the same manner as the use of illegal drugs and alcohol.

6.2 Illegal Drugs and Alcohol

- a. The use, sale, purchase, transfer, manufacture, solicitation, or possession of an illegal drug or of alcohol by any team member while on premises or while performing business is prohibited.

7. DISCIPLINE

- 7.1 Any team member who possesses, is using, consuming, manufacturing, soliciting, distributing, selling, attempting to sell, or transfer illegal drugs on Doran & Ward Printing Company premises or while on Doran & Ward Printing Company business or at any time during the hours between the beginning and ending of the team member's work day, whether or not on duty, will be discharged.
- 7.2 Any team member who is found to be in possession of or under the influence of alcohol while on Company business or at any time during the hours between the beginning and ending of the team member's work day, and whether or not on Company business or property, is guilty of misconduct and is subject to discipline up to and including termination. This rule does not apply to alcoholic beverages provided by Doran & Ward Printing Company for consumption during a special Company-sponsored event.
- 7.3 Any team member who is found to be in possession of contraband in violation of this policy will be subject to discipline up to and including discharge
- 7.4 Any team member who is found through drug or alcohol testing to have in his or her body a detectable amount of an illegal drug(s), abuse of legal drug(s) or of alcohol (a reading equal to or greater than .04) will be subject to discipline up to and including discharge.

7.5 Any team member who refuses to submit to a drug test when requested to do so will be considered a presumptive positive and will be subject to discipline up to and including termination.

8. PRE-EMPLOYMENT SUBSTANCE ABUSE SCREENING PROGRAM

- 8.1 All applicants who have been offered a position (full time, part-time, temporary, and former team members) with Doran & Ward Printing Company will be required to submit to a substance abuse screening.
- 8.2 An applicant will be notified of Doran & Ward Printing Company's drug and alcohol testing policy prior to being tested; will be informed in writing of his or her right to refuse to undergo such testing; and will be informed that the consequence of refusal is termination of the pre-employment process.
- 8.3 An applicant will be provided written notice of this policy and by signature will be required to acknowledge receipt and understanding of the policy.
- 8.4 Any applicant who refuses to acknowledge notification of this policy, to take the substance abuse screening, or to sign required consent forms, or who fails to appear for testing, tampers with substance abuse screening or who has a positive test result will not be hired.
- 8.5 The prospective team member may provide any information, which may be relevant medical information. To the extent feasible, all precautions will be taken to ensure that the testing only measures and the records concerning the testing only make use of information regarding drugs in the body. The following is a list of drugs for which testing will be conducted.

- ◆ Amphetamines
 - Amphetamine
 - Methamphetamine
- ◆ Barbiturates
- ◆ Benzodiazepines
- ◆ Cannabinoids
 - Carboxy-THC
- ◆ Cocaine
 - Benzoylcegonine
- ◆ Opiates
 - Codeine
 - Morphine
- ◆ Phencyclidine (PCP)

9. DRUG AND ALCOHOL TESTING OF TEAM MEMBERS

- 9.1 Doran & Ward Printing Company will notify team members of this policy by:
- a. Providing to each team member a copy of the policy, and obtaining a written acknowledgment from each team member that the policy has been received and read.
 - b. Announcing the policy in written communication and/or presentations at team member meetings.

- 9.2 Doran & Ward Printing Company may perform drug testing:
- a. Of any team member who manifests “reasonable suspicion” behavior. A team member may be required to submit to a drug test if the company has evidence that a team member is using or has used drugs in violation of the company’s written policy. This evidence must be drawn from specific objective and articulable facts and reasonable inferences drawn from those facts in light of experience: Examples that might support such are:
 - ◆ Observations made at work, such as direct observation of drug use or the physical symptoms or being impaired due to drug use.
 - ◆ Abnormal conduct or erratic behavior while at work or a significant deterioration in work performance.
 - ◆ A report, by a reliable and credible source, of drug use.
 - ◆ Evidence that an individual has tampered with any alcohol or drug test during the individual’s employment.
 - ◆ Evidence that a team member has caused an accident resulting in personal injury other than minor injuries requiring only first aid treatment and which do involve medical treatment, loss of consciousness, restriction of work or motion, or transfer to another job, or property damage of \$1,000 or more.
 - ◆ Evidence that a team member has manufactured, sold, distributed, solicited, possessed, used, or transferred drug (s) while working, or while on the employer’s premises or while operating the employer’s vehicle, machinery or equipment.
 - b. In conjunction with the investigation of any accidents in the workplace, where the accident results in an injury to a person other than a minor injury requiring only first aid treatment and which did not involve medical treatment, loss of consciousness, restriction of work or motion, or transfer to another job, or when the accident report could be required under Chapter 88 (IOSHA), or which result in damage to property including to equipment in an amount reasonably estimated at the time of the accident to exceed more than \$1000, the company may require team members to submit to drug or alcohol testing.
 - c. Doran and Ward Printing Company will conduct unannounced drug or alcohol testing of its entire team member population. The selection of team members to be tested shall be done based on a neutral and objective selection process by an entity independent from Doran & Ward Printing Company and shall be made by a computer based, random number generator that is matched with team member social security numbers payroll identification or other comparable identifying numbers in which each team member subject to testing has an equal chance of selection for testing, regardless of whether the team member has been selected or tested previously.

The random selection process shall be conducted through a computer program.
 - d. Drug testing shall occur during, or immediately before or after a regular work period. The time required for testing, including travel time, is considered work time for purposes of compensation and benefits.
 - e. The actual costs for testing, other than for a second, confirmatory test, if one is requested as provided by law, is paid for by the Company. If the drug sample collection is conducted at a place other than the team member’s normal work site, the Company will provide transportation, or pay reasonable transportation cost the team member.

- 9.3 A team member who refuses to acknowledge notification of the Policy, to take the substance abuse screen or to sign required consent forms will be regarded as having violated a work rule and will be subject to discipline, up to and including discharge.
- 9.4 Upon receipt of a confirmed positive drug or alcohol test result, a team member may be suspended pending receipt of written test(s) results and whatever inquiries may be required.
- 9.5 Management reserves the right to require that the producing of a sample be observed by the individual performing the test.

10. CONFIRMATION OF A DRUG TEST RESULT

- 10.1 If there is a “positive” test result reported to Doran & Ward Printing Company by the Medical Review Officer, the team member will be notified of the result by the Human Resources Coordinator (or the Plant Manager if the Human Resources Coordinator is not available), in person for onsite random drug testing and by certified mail with return receipt requested. The team member will be notified of their right to obtain a second confirmatory test and the cost of the test.
- 10.2 The team member may, at their expense, have a confirmatory test performed on the second sample of the specimen that yielded the positive result, at an approved laboratory.
- 10.3 During the period of an appeal and any resulting inquiries, the pre-employment selection process for an applicant will be placed on hold, and the employment status of a team member will be suspended. A team member who is suspended pending an appeal will be permitted to use any available annual leave in order to remain in an active pay status. If the team member has no annual leave or chooses not to use it, the suspension will be without pay.
- 10.4 The team member will be eligible to re-apply for employment at Doran & Ward Printing Company under the following conditions:
 - a. Required to wait at least 90 days from the date of termination to reapply for a position at Doran & Ward Printing Company
 - b. Application will be treated as any other application received by this company and subject to the same policies and procedures
 - c. Offer may be contingent to the applicant’s agreement to additional drug testing
 - d. If rehired, subject to the same probationary period as well as waiting periods for any of the benefits that are offered.

11. INSPECTION AND SEARCHES

- 11.1 Doran & Ward Printing Company may conduct unannounced general inspections and searches for drugs or alcohol on Doran & Ward Printing Company premises or in Doran & Ward Printing Company vehicles or equipment wherever located. Team members are expected to cooperate.
- 11.2 Search of a team member and his or her personal property may be made when there is a reasonable suspicion to conclude that the team member is in violation of this policy.
- 11.3 A team member’s consent to a search is required as a condition of employment, and the team member’s refusal to consent may result in disciplinary action, including discharge, even for a first refusal.

- 11.4 Illegal drugs, drugs believed to be illegal, and drug paraphernalia found on Doran & Ward Printing Company property may be turned over to the appropriate law enforcement agency and full cooperation given to any subsequent investigation. Substances that cannot be identified as an illegal drug by a layman's examination may be turned over to a forensic laboratory for scientific analysis.
- 11.5 Other forms of contraband, such as firearms, explosives, and lethal weapons, will be subject to seizure during an inspection or search. A team member who is found to possess contraband on Doran & Ward Printing Company property or while on business will be subject to discipline up to and including discharge.
- 11.6 If a team member is the subject of a drug-related investigation by Doran & Ward Printing Company or by a law enforcement agency, the team member may be suspended pending completion of the investigation.

12. CONFIDENTIALITY

- 12.1 All information relating to drug testing or the identification of persons as users of drugs will be protected by Doran & Ward Printing Company as confidential unless otherwise required by law, overriding public health and safety concerns, or authorized in writing by the person (s) in question.