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"PROVIDING THE WARRIGHTER THE RIGHT SOLUTIONS AT THE RIGHT TIME"

Policy Title: Drug-Free Workplace Policy

Purpose

GSI values all employees and recognizes their need for a safe and healthy work environment. Being under the influence of a drug or alcohol on the job may pose serious safety and health risks not only to the user but to all those who work with the user and our customers and vendors. The possession, use, or sale of an illegal drug or alcohol in the work place may also pose unacceptable risk for safe, healthful and efficient operations.

GSI recognizes that its own health and future are dependent upon the physical and psychological health of its employees. Accordingly, it is the obligation and intent of the Company to maintain a safe, healthful and efficient working environment for all of its employees and to protect Company property, equipment and operations.

With these basic objectives in mind, GSI has established the following policy with regard to use, possession or sale of alcohol and/or drugs.

Policy

This policy statement affirms GSI's commitment to provide a safe and healthful workplace. The policy will promote a work environment that is drug and alcohol free and devoid of hazards which might cause injury or illness to employees and/or customers or vendors by implementing standards and procedures for drug testing of employees and job applicants. Employees with a substance abuse problem are encouraged to contact the Employee Assistance Program. Where and when appropriate, GSI will work with employees to attempt to resolve their problem.

Scope

This Drug-Free Workplace Policy applies to: (1) all employees of GSI; and (2) all candidates for employment with GSI.

Procedure

1. Being under the influence or on-the-job use, possession, distribution or manufacture of illegal drugs, "Tested-for-Substances" or alcohol.

Alcohol

The consumption, possession or being under the influence of alcohol is prohibited while:

- a. performing GSI business
- b. in a GSI vehicle
- c. on GSI property; or
- d. being paid by GSI

“Under the influence” means that the employee is affected by a drug, or by alcohol, or by the combination of a drug and alcohol in any detectable manner. The symptoms of influence are not confined to those consistent with misbehavior or to obvious impairment of physical or mental ability, such as slurred speech or difficulty in maintaining balance. A determination of influence can be established by a professional opinion, a scientifically valid test or, in some cases, by a lay person’s opinion. “Under the influence” also means that a certain prescribed amount of alcohol, illegal drug, or any tested-for-substance, as set forth in this Policy Statement under the “Testing Guidelines,” is detected in an individual’s hair such that the test result is positive under these Testing Guidelines.

Moderate use of alcohol in connection with business meals, business travel, business entertainment, social events and the like may be acceptable.

Legal Drugs

Except as provided below, the use of or being under the influence of any legally obtained drug by any associate while performing Company business or while in a Company facility is prohibited to the extent that such use or influence may affect the safety of the employee, co-workers or members of the public, the employee’s job performance, or the safe or efficient operation of the Company facility or equipment. An employee may continue to work, even though under the influence of a legal drug, if management has determined, after consulting with the employee, the employee’s physician, and any other person or entity the Company feels necessary, that the employee does not pose a threat to his or her own safety, the safety of co-workers, and the employee’s job performance is not significantly affected by the legal drug. The employee taking drugs for medical reasons which may affect his/her performance must provide a doctor’s note which certifies that the employee can safely perform his/her particular job under the influence of the medication. Otherwise, the employee may be required to take a leave of absence or comply with other appropriate action determined by management.

Tested-for-Substances or Illegal Drugs

The consumption, possession, or being under the influence of tested-for-substances or illegal drugs is prohibited while:

- a. performing GSI business
- b. in a GSI vehicle
- c. on GSI property; or
- d. being paid by GSI

2. General Testing Policy

To maintain a safe and healthy workplace, drug and/or alcohol testing may be conducted on a pre-employment, reasonable cause, post-accident basis, as well as pursuant to a last-chance agreement, to determine the use of alcohol, illegal drugs, and/or other tested-for substances.

Pre-Employment Screening

GSI will maintain pre-employment screening practices designed to prevent hiring individuals who use tested-for substances and who are seeking positions with the Company. Applicants for employment, i.e. people who have applied for a position with the Company and have been offered employment conditioned upon successfully passing a drug test, will be required to submit hair or urine samples for

the purpose of screening for use of tested-for substances. This requirement will be publicized to the applicants. GSI will not offer employment to applicants who do not complete the pre-employment screening process or who are found to use tested-for substances except when such use is for bona fide medical reasons and will not interfere with the ability to perform essential duties as determined by the Company or the applicant's physician. An applicant's failure to appear for a drug test will be considered a rejection of the employment offer.

Reasonable Cause Testing

GSI will initiate and maintain reasonable cause testing for tested-for substances for all associates. Testing will occur when at least one (1) supervisor or Human Resources representative has observed actions, appearance, or conduct indicative of the use of tested-for substances. Anyone who tests positive may be subject to immediate discharge. An employee's failure to appear for a drug and/or alcohol test will be considered a voluntary resignation of employment. Testing may be done by hair, saliva and/or urine analysis and/or the use of a breathalyzer as deemed appropriate by the Company.

Post-Accident Testing

GSI may conduct work-related, post-accident drug and/or alcohol tests for all employees who incur a work related injury. Testing will occur for employees who have injured themselves on the job, caused the injury of another employee or other individual on the job, had an accident while operating or assisting in the operations of Company machinery, or had an accident while operating a Company vehicle. Anyone who tests positive may be subject to immediate discharge. An employee's failure to appear for a drug and/or alcohol test will be considered a voluntary resignation of employment. Testing may be done by hair, saliva and/or urine analysis and/or the use of a breathalyzer as deemed appropriate by the Company.

Return to Employment

GSI may conduct random drug and/or alcohol tests for any employee returning to work after having been removed voluntarily or otherwise from active status due to drug or alcohol abuse. Anyone who tests positive may be subject to immediate discharge. An employee's failure to appear for a drug and/or alcohol test will be considered a voluntary resignation of employment. Testing may be done by hair, saliva and/or urine analysis and/or the use of a breathalyzer as deemed appropriate by the Company.

Last-Chance Agreement

GSI may conduct drug and/or alcohol tests for any employee pursuant to the terms of a Last-Chance Agreement. Failure to comply with the Last-Chance Agreement, or a subsequent positive test, will result in immediate discharge. An employee's failure to appear for a drug and/or alcohol test will be considered a voluntary resignation of employment. Testing may be done by hair, saliva and/or urine analysis and/or the use of a breathalyzer as deemed appropriate by the Company.

Employees believed to be under the influence of drugs, alcohol or narcotics will be required to leave the premises. The employee's supervisor should be notified to arrange safe transit.

3. Consequences of Violating the Policy

If an employee tests positive on a drug or alcohol screening test, he/she may be subject to immediate discharge. If the employee is retained, he/she may be required to enroll and complete a treatment program prior to returning to work. The cost of the treatment program is at the employee's expense. An employee undergoing rehabilitation must, upon request, provide the Company with certification(s) indicating that he/she is faithfully following a recommended treatment program. Refusal to seek or follow recommended treatment or other violations of this policy will result in termination.

4. Employee's Reporting Requirements

Legal Drugs

An employee's use of legal drugs can pose a significant risk to the safety of the employee and others. "Legal drugs" includes drugs prescribed by a licensed practitioner of medicine and over-the-counter drugs which have been legally obtained and are being used for the purpose for which they were prescribed or manufactured. Employees who feel or have been informed that the use of legal drugs may present a safety risk should report such drug use to a supervisor or a member of Human Resources.

Alcohol, Illegal Drugs, and Tested-for Substances

Sustaining a safe and healthful workplace requires a commitment by every GSI employee. Employees who are aware of an individual who is consuming, selling, or possessing alcohol, illegal drugs, or tested-for substances are urged to report their knowledge to their supervisor or a member of Human Resources. The names of employees providing such information will be kept confidential to the extent possible.

An "illegal drug" means any drug: (a) which is not legally obtainable; or (b) which is legally obtainable, but has not been legally obtained. The term includes prescribed drugs not legally obtained and prescribed drugs not being used for prescribed purposes. It also includes marijuana. "Tested for substance" means any drug for which the Department of Transportation requires testing including marijuana, cocaine, amphetamines (e.g., "speed"), opiates (e.g., "morphine and codeine"), and phencyclidine (e.g., "PCP").

5. All employees of GSI are subject to the Drug-Free Workplace Act. Therefore, employees who are convicted of any criminal drug statute violation occurring in or outside of the workplace must report the conviction to the Corporate HR Department within five (5) days of such conviction, and the Corporate HR Department will take appropriate action as required by law. Failure to report such conviction may result in termination.

6. Employees, their possessions, and GSI issued equipment and containers under their control are subject to search and surveillance at all times while on GSI premises or work sites or while conducting GSI business.

7. Authority

Omnibus Drug Initiative Act [The Drug-Free Workplace Act of 1988 - 41 U.S.C. Section 701 ET.SEQ. (October 21, 1988)], effective 01/01/89, mandates that government contractors must maintain drug-free workplaces.

Department of Defense Interim Rule 48 CFR Parts 223 and 252 [5 U.S.C. 301, 10 U.S.C.

2202, DoD Directive 5000.35 and DoD FAR Supplement 201.301], effective 09/28/88, sets forth the policy for defense contractors to maintain a drug free work force.

Drug-Free Workplace

We are well aware that the drug/alcohol abuse problem in America's workforce is monumental. Drug/alcohol abuse cuts through all levels of employment and is a problem in every sector of the business world. Recently, both Congress and the Department of Defense issued requirements to ensure that drugs/alcohol do not permeate the government contract arena, and have mandated that government contractors must maintain drug/alcohol-free workplaces and workforces by, among other methods, testing for suspected illegal drug/alcohol use by employees who have access to classified information.

As a government contractor, Global Solutions International, LLC, Inc. (GSI) is mandated by the Omnibus Drug Initiative Act (The Drug-Free Workplace Act of 1988), to establish a Drug-Free Awareness Program. In accordance with the Department of Defense Interim Rule, we must establish an Employee Assistance Program, which is designed to train supervisors and managers on the identification of illegal drug use by employees, to provide referrals for treatment, as well as to implement a controlled and monitored drug-testing program.

In addition, GSI is required by the Drug-Free Workplace Act to publish a statement notifying all employees that we have a policy in effect that is legally enforceable:

Global Solutions International, LLC, Inc. strictly prohibits the unlawful manufacture, distribution, dispensing, possession or use of controlled substances in the workplace. Disciplinary actions will be taken against employees for violations of such prohibition and individuals will be subject to the sanctions as indicated in the Drug-Free Workplace Policy.

In addition, Global Solutions International, LLC, Inc. is concerned about problems that employees may have that will affect their job performance. Employees may have personal problems that are easily solved independently or with help from their supervisor. In cases where these actions are not enough to solve the problem and unsatisfactory performance persists over a long period of time, GSI may provide an outside resource through the Employee Assistance Program (EAP) which is designed to help resolve such problems. The GSI EAP is outlined in the Drug-Free Workplace Policy.

Please take a few minutes to review the newly approved Drug-Free Workplace Policy. This policy may be found in your Director's copy of GSI's Policy and Operating Instructions Manual.

If you have any questions or concerns regarding any aspect of our policy, please discuss them with your supervisor or the HR Department.