



Commercial, LLC

COATINGS - SEALANTS - VWC - EPOXY SYSTEMS

QC1009– Substance Abuse Policy

Quality Control / Standard Operating Procedure

1.0 PURPOSE

QC values its employees and recognizes their need for a safe and healthy work environment. Furthermore, employees abusing drugs and alcohol are less productive and are often a risk to the safety and productivity of the company. The establishment of a Drug-Free Workplace Policy is consistent with this QC's desire to promote a safe and accident-free workplace.

2.0 SCOPE

- 2.1 QC prohibits the use, possession, sale, manufacture, and distribution of alcohol and illegal substances and/or drug-related paraphernalia on company premises or while performing work on any of QC's worksites.
- 2.2 The substances prohibited by this policy include such items as:
 - A) Any illegal or unlawfully obtained drugs or controlled substances
 - B) Prescribed medications not being used for purposes intended
 - C) Mood or mind-altering substances
 - D) Alcoholic or intoxicating beverages
- 2.3 Compliance with this policy will be required by QC as a condition of employment for qualified applicants or for continued employment of current employees. The presence of a detectable amount of any prohibited substance in an employee during working hours may be deemed a violation of this policy, regardless of when or where the substance entered the employee's system.

3.0 REFERENCES

- 3.1 QC1007-x Employee Training and Qualification
- 3.2 F1009-x Employee Drug Screening Consent Form



Commercial, LLC

COATINGS - SEALANTS - VWC - EPOXY SYSTEMS

4.0 PROCEDURE

4.1 Pre-Employment Screening

4.1.1 Offers of employment with QC may be conditioned on proper cooperation with and participation in a drug and controlled substance screening test. Following a conditional employment offer, applicants will be asked to sign a form consenting to a screening test as part of the application process. Failure to sign the consent form will be considered a withdrawal of the application.

4.1.2 Applicants who test positive without a legitimate medical reason will be denied employment. In appropriate circumstances, QC may, in its sole discretion, authorize a retest.

4.2 Testing of Employees

4.2.1 QC may request current employees to submit to a drug test in certain circumstances, including the following:

- A) When an employee's conduct, actions or behavior reasonably leads management to suspect that the employee may be using or under the influence of drugs or alcohol on company premises or while performing work on any of QC's worksites
- B) When an employee has a prohibited substance in his possession while on company premises or while performing work on any of QC's worksites
- C) When an employee has experienced an on-the-job injury or accident or is involved in an incident which QC believes may have resulted from impairment due to drug or alcohol use
- D) QC may, in its sole discretion and at any time, require an employee to undergo tests to determine the presence of alcohol or drugs in his system

4.2.2 An employee who has tested positive on a test pursuant to this policy and who is not terminated, may be retested at periodic intervals, as determined by QC, for up to twelve months after the positive test result, even without new evidence of "reasonable belief" of drug or alcohol abuse. If an employee tests positive on any retest or refuses to promptly submit to a test in a fully cooperative manner, including signing any required forms, the employee may be subject to immediate termination.

4.2.3 An employee's refusal to submit to a requested test may be considered an act of insubordination justifying discipline, up to and including immediate termination.

4.3 Testing Procedures

4.3.1 When feasible, the employee asked to submit to testing will be informed of the reasons, cause or action leading to the request.



Commercial, LLC

COATINGS - SEALANTS - VWC - EPOXY SYSTEMS

- 4.3.2 Employees will complete a consent for testing form. The refusal to do so will be considered a violation of this policy, and the employee may be subject to disciplinary action up to and including termination.
- 4.3.3 Testing will be conducted by an appropriate testing facility designated by QC or by one of its customers. Applicants and employees must cooperate fully with reasonable procedures and requirements of the testing facility.
- 4.3.4 Each employee and applicant who is to be tested will be asked by QC's designated testing facility to list all legal and prescription drugs consumed during the past thirty days, and will have an opportunity to explain the use of each such drug. Applicants or employees who do not report the use of any such drugs and who subsequently test positive on any required screening or other test, will not be hired if not yet employed, or if hired, may be subject to immediate discharge.
- 4.3.5 Positive test results will be given a second verification test by the designated testing facility. Employees who test positive on the second verification test will be subject to discipline up to and including immediate termination for violation of this policy. Applicants who test positive on the second verification test will not be employed.
- 4.3.6 Test results will be returned to QC's management team for review with the applicant or employee. Test results will be maintained in a confidential manner in a separate file not part of the employee's personnel file. Test results of applicants will be maintained in a separate file, not part of the application.
- 4.3.7 QC will attempt to keep the results of any drug, substance abuse or other such test confidential. Test results and voluntary reports of drug and alcohol problems will not be revealed by QC to any person except those persons believed to have a need to know because of such reasons as supervision of the employee involved, personnel administration or as otherwise deemed necessary as required by law.

REVISION TABLE

Version	Date	Changes
1	07-06-06	Original Draft

APPROVAL

QC Commercial, LLC	Russ Phillips		07-06-06
Company	Print Name	Signed	Date