



Drug, Alcohol, and Smoking Policy

Purpose

- Tradesmen International, LLC (“Tradesmen”) has a longstanding commitment to providing a safe, productive, and healthy work environment. Widely available statistics and information establish that the incidence of alcohol and drug abuse is increasing and that the effect is devastating to lives, and to business and the community at large.
- **The use of drugs and alcohol may have an impact on an individual’s capacity to perform work safely, efficiently, and with respect, thereby posing a risk to the health and safety of the individual and others at the workplace.** For those reasons, Tradesmen is committed to maintaining a safe and secure workplace which requires a clear policy and supportive programs relating to the detection, treatment, and prevention of substance abuse by employees.
- This Drug, Alcohol, and Smoking Policy (this “Policy”) describes the responsibilities of Tradesmen’s management and other employees, as well as the consequences of not complying with this Policy.

Scope

- This Policy applies to all Tradesmen employees, being full-time, part-time, fixed term and casual employees while on the job and to situations where an employee’s off-the-job or off-premises conduct impairs work performance or undermines public confidence in or harms the reputation of Tradesmen.
- All persons who work at the direction of, or on behalf of Tradesmen (for example agents, contractors, subcontractors, consultants, and temporary staff) are also covered by this Policy. These persons and Tradesmen employees are collectively referred to in this Policy as “Associates”.
- Although Tradesmen has no intention of intruding into the private lives of its Associates, the company recognizes that involvement with alcohol or other drugs off the job eventually takes its toll on job performance. Tradesmen’s concern is to ensure that Associates report to work in a condition to perform their duties safely and efficiently in the interest of their fellow workers and Tradesmen customers, as well as themselves.
- Tradesmen reserves the right to inspect all portions of each Tradesmen office or work area for drugs, alcohol, or other contraband. Associates may be asked to cooperate in inspections of their persons, work areas and property that might conceal a drug, alcohol or other contraband. Associates who possess such contraband or refuse to cooperate in such inspections are subject to appropriate discipline, up to and including discharge. For clarification, Tradesmen’s right to inspect an office or work area does not extend to an Associate’s home even if the Associate is working from home.
- For Tradesmen field employees on assignment at client worksites, and other Associates who visit client worksites, this policy is supplemented by the Drug and Alcohol Policy set forth in TI-523 and distributed to Tradesmen field employees during the employment application process.

Policy Effective Date

August 1, 2020.

Workplace and Work-Related Functions

- A “Work-Related Function” means any function that is connected to work, including (but not limited to), conferences, work meals, Christmas or holiday parties, client functions, safety cookouts, team building / celebration events and other Sanctioned Events (as defined in the Tradesmen Travel and Expense Policy found at <http://intranet.tradesmeninternational.com/docs/Tradesmen%20T&E%20Policy%20Combined.pdf>). Associates must comply with this Policy at all work-related functions.
- A “Workplace” means a workplace owned or leased by Tradesmen and other workplaces or situations where Associates may be working or representing the company including telecommuting from home.
- This Policy applies at all Workplaces and Work-Related Functions and is not restricted by core work hours.



Under the Influence

- “Under the Influence” means that a person’s faculties are impaired by the use of drugs or alcohol to the extent that the person is unfit to be entrusted with duties they perform, or may be called on to perform, with efficiency and safety to themselves and others.
- Factors that may indicate that a person is Under the Influence and therefore unfit to be entrusted with the duties they perform or may be called on to perform with efficiency and safety include, without limitation:
 - Odors (smell of alcohol, body odor or urine).
 - Movements (unsteady, fidgety, dizzy).
 - Eyes (dilated pupils, bloodshot, constricted or watery eyes, or involuntary eye movements).
 - Face (flushed, sweating, confused, or blank look).
 - Speech (slurred, slow, distracted mid-thought, inability to verbalize thoughts).
 - Emotions (argumentative, agitated, irritable, or drowsy).
 - Actions (yawning, twitching, or behaving other than a professional and competent manner in the performance of their job and in upholding the values and policies of Tradesmen).
 - Inactions (sleeping, unconscious, or no reaction to questions).
- In determining whether an Associate is so impaired, the company may consider, amongst other things, the Associate’s duties and the environment in which they perform those duties.

Drugs

Illegal Drugs.

- Associates must not bring or possess any illegal drugs at or to a Workplace. Associates must not sell (or plan to do so outside of work or while at work), consume or dispense illegal drugs or prescription or Pharmacy Drugs.
- Federal law continues to define marijuana as a controlled substance. Therefore, where lawful, Tradesmen will treat marijuana, other than lawfully prescribed marijuana used for medical purposes, in the same manner as it treats other drugs made illegal by their classification as controlled substances under federal law.

Prescription and Pharmacy Drugs.

- Tradesmen recognizes that Associates may have legitimate medical reasons for taking some drugs, specifically where a medical practitioner has prescribed lawful drugs for medical purposes or where the drug is lawfully available at pharmacies (with or without a prescription) and is required for medical purposes. These drugs are referred to in this policy as “Prescription Drugs” and “Pharmacy Drugs”, respectively. For purposes of this Policy, lawfully prescribed medical marijuana will be treated the same as Prescription Drugs or Pharmacy Drugs.
- Where Associates are properly taking Prescription Drugs or Pharmacy Drugs for medical purposes, they will not breach this Policy by attending work. However, Associates must take prescription and Pharmacy Drugs in accordance with the instructions of their medical practitioner and normal directions applying to the use of those drugs to ensure a safe work environment. Associates must not misuse or abuse Prescription Drugs or Pharmacy Drugs or become intoxicated by prescription of Pharmacy Drugs as set out in this Policy.
- Associates are also responsible for informing themselves of the impact of consumption of alcohol on Prescription Drugs and Pharmacy Drugs and ensuring they limit consumption accordingly. It is also each Associate’s responsibility when taking Prescription Drugs or Pharmacy Drugs to check with their medical practitioner about the effect of the drug on their ability to drive vehicles, operate machinery and safely perform their normal work duties. If an Associate’s ability to perform work safely is, or may reasonably be, affected in any way, that Associate should consult with an appropriate medical practitioner as soon as practicable.
- The company should be notified as soon as possible if an Associate’s performance is affected, in any way, using Prescription Drugs or Pharmacy Drugs. Failure to notify the company may result in disciplinary action, up to and including dismissal.



- If the company suspects that an individual's ability to efficiently and safely perform work is affected by Prescription Drugs or Pharmacy Drugs, the company may take steps to address the issue in accordance with this Policy.
- If an Associate knowingly misuses or abuses Prescription Drugs or Pharmacy Drugs, then the occurrence will be treated the same as for illegal drugs.

Consumption of Alcohol

- Tradesmen recognizes that Associates enjoy a variety of social activities and that these may include the consumption of alcohol. Those who are organizing and supervising Work-Related Functions (whether on or off a Workplace) are expected to do so in a safe, responsible manner that will not likely cause harm to another person or Tradesmen's property or reputation. If a Sanctioned Event is being held on Tradesmen premises or under Tradesmen's exclusive sponsorship, then permission to dispense alcohol must be obtained by as part of the preapproval for the Sanctioned Event.
- All Associates and their guests are required to abide by the following requirements and restrictions in relation to all Work-Related Functions:
 - Associates must consume alcohol responsibly and should not be Under the Influence at a Work-Place Event.
 - Associates must not act in a manner that is contrary to Tradesmen's policies, standards and codes of conduct and must always uphold an appropriate standard of behavior. Intoxication is not considered an "excuse" for misconduct. Loss of memory of conduct due to intoxication does not diminish an individual's responsibility for misconduct.
 - The restrictions set out below in relation to company vehicles and machinery continue to apply.
 - Associates must ensure a safe means of transport from Work-Related Functions. Associates must not drive any vehicle if they are intoxicated. Associates who do not have another means of transport should advise their supervisor or manager to arrange transport.

No Smoking

- Tradesmen is a smoke free work environment. Except as otherwise provided in this Policy, no Associate is permitted to smoke within, or in proximity to, company buildings and tool of trade vehicles. On a Tradesmen owned or leased Workplace, smoking may only be undertaken within designated smoking areas. No litter due to smoking (i.e., cigarette butts) is to be left visible.
- On non-Tradesmen Workplaces sites, where there is no formal designated outside smoking area, it is expected that smoking will be undertaken away from buildings and certainly away from the thoroughfares or proximity to people.

Employee Responsibilities

- Each Associate has the responsibility to:
 - Read and comply with this Policy.
 - Recognize that performance of duties could be affected by alcohol or drugs.
 - Immediately notify Tradesmen management if they are aware of any breach of this Policy by another Associate. Subject to any disclosures required by law, any notifications received by Tradesmen management will be treated confidentially. Failure to report any breach of this Policy by another Associate may itself constitute a breach of this Policy.
 - Contact their supervisor with any questions concerning this Policy.
 - Know and adhere to all applicable laws governing the use of alcohol and controlled substances.
 - Report to work fit for duty and free of any adverse effects of alcohol or illegal drugs.
 - Consult with their medical provider to determine whether Prescription Drugs or Pharmacy Drugs taken by the Associate have an effect on the Associate's fitness for duty, ability to perform the essential functions of their position and ability to work safely, and, if so, inform their supervisor that they are taking such Prescription Drugs or Pharmacy Drugs.
 - Support company efforts to eliminate alcohol and other drug abuse among Associates where it exists.
 - Seek and accept assistance for alcohol and other drug-abuse-related problems before job performance is affected.
 - If an Associate or guest believes that they are unable to drive home from a Work-Related Event, the Associate or guest should arrange for an Uber, Lyft or other safe means to transport the Associate or guest home. Tradesmen



will reimburse the Associate for the reasonable cost of such safe transportation, in accordance with the Tradesmen Travel and Expense Policy.

- An Associate who violates this Policy, and any Tradesmen supervisor who approves of such a violation, will be subject to corrective action. Examples of disciplinary action that may be taken include:
 - Performance counselling.
 - A formal warning.
 - Suspension.
 - Demotion.
 - Termination of employment.
 - Referral to an employee assistance program and / or some other referral source, for counselling, treatment, or rehabilitation for drug or alcohol dependency.

Prohibited Activities

- An Associate's possession of illegal drugs in a Workplace or at a Work-Related Event is strictly prohibited.
- An Associate may not report for work (including returning to work from a Work-Related Event), work (including telecommuting), or operate a vehicle within the scope of their employment while Under the Influence.
- An Associate may not while on the job (including telecommuting), during working hours, in or around a Workplace, while on company business, or while operating or riding in a vehicle during the scope of employment:
 - Possess, transmit, receive, or use intoxicating beverages (unless used in moderation at a Work-Related Event); or
 - Unlawfully manufacture, distribute dispense, receive, possess, or use controlled substances (including, without limitation, medically prescribed marijuana. See Illegal Drugs above.) or drug paraphernalia.

For further clarification, an Associate (i) should not consume any intoxicating beverages while working or at a Workplace (unless a Sanctioned Event), (ii) should not return to working in a workday if the Associate has consumed intoxicating beverages during such workday and (iii) may consume or had consumed intoxication beverages for off-hours work that is not conducted at a Workplace (excluding an Associate's home) to the extent the Associate is not Under the Influence.

- Any illegal drugs or drug paraphernalia in the possession of an Associate will be turned over to an appropriate law enforcement agency and may result in criminal prosecution, in addition to employment discipline as a violation of this Policy.
- No Associate may bring their own alcohol to a Work-Related Event or to a Workplace (excluding an Associate's home if telecommuting).
- Each Tradesmen supervisor has the absolute discretion to refuse the service of alcohol to any Associate, or the guest of an Associate, who is intoxicated, or displays signs of, intoxication.
- At Work-Related Events, no person may coerce or persuade any other person to drink alcohol.
- Tradesmen reserves the right to cease the use of alcohol at Work-Related Events at any time.
- No person under the age of 21 may be served or possess any alcoholic beverage with the intent to consume it at a Work-Related Event.

Testing

- If a Tradesmen supervisor reasonably suspects that an Associate's use of drugs and/or alcohol may adversely affect the Associate's job performance or the safety of the Associate or others in the workplace, the supervisor may request an alcohol and/or drug screening.
- When testing based on reasonable suspicion is warranted, Tradesmen will take steps to address the issue, including, but not limited to:
 - Directing the Associate to go home. Suitable arrangements for safe transport will be made by the relevant manager.
 - Directing the Associate to undergo a drug or alcohol screening.



- If an Associate refuses to undertake a drug or alcohol screening, the Associate will be directed to go home. Refusal to submit to a drug or alcohol screening or refusal to go home constitutes a breach of this Policy.
 - Where an Associate is sent home or is required to undergo a drug or alcohol screening, the Associate may be required to report to their supervisor (or as directed) on the next working day, or as soon as possible once the Associate is no longer Under the Influence. Failure to report constitutes a breach of this Policy.
 - Under no circumstances will an Associate be allowed to drive to the testing facility. A member of management must transport the Associate or arrange for a cab or ride-sharing service and arrange for the Associate to be transported home.
- Once an alcohol or drug screening test has been initiated under this Policy, unless otherwise required by the Family and Medical Leave Act or the Americans with Disabilities Act, the Associate will have forfeited the opportunity to be granted a leave of absence for treatment, and will face possible discipline, up to and including discharge.

Breach of Policy

- Associates are always required to comply with this Policy.
- If an Associate is found to have breached this Policy, they will be subjected to disciplinary action. The type and severity of the disciplinary action will depend upon the circumstances of the case and the seriousness of the breach. In serious cases, this may include termination of employment.
- Agents, contractors, or subcontractors (including temporary contractors or subcontractors) of the company who are found to have breached this Policy may have their contracts with the company terminated or not renewed.

Office Employee Assistance

- Tradesmen may assist, through its established benefit programs, those Tradesmen employees who may have problems with illegal or unauthorized substance abuse. If a Tradesmen employee participates in one or more benefit programs offered by Tradesmen and would like additional information, the employee should consult the Benefits section of the HR page on the Tradesmen Intranet site, or call the HR Department at (440) 349-3432, and ask for a Benefits team member.
- If the Tradesmen employee does not participate in Tradesmen's benefit programs and would like assistance with substance abuse issues, the employee should consult their primary care provider.

Administration

- Tradesmen's Chief Human Resource Officer ("CHRO") will administer this Policy and will have full power and authority to construe, interpret, and administer this Policy. All decisions regarding this Policy will be made by the CHRO and will be final and binding on all Associates.
- Tradesmen reserves the right to amend this Policy from time to time or to discontinue it if such a change is deemed necessary or desirable, and each employee is responsible for regularly reviewing the terms of this Policy.
- The information provided in this Policy is not intended to supersede any applicable local, state, or federal law, and in the event of a conflict, the law shall prevail.



Drug & Alcohol Policy

Management recognizes that illegal drug and alcohol use poses a serious threat to the overall safety and general well being of our valued employees and others. It also significantly impacts the overall efficiency and productivity upon which our jobs depend.

The use of alcohol and illegal drugs leads to unsafe working conditions for all workers. The impaired worker is a serious potential hazard to himself / herself and to their coworkers. The purpose of Tradesmen International's Drug & Alcohol Policy is to establish and help maintain a safe working environment, which is free from illegal drug and alcohol use.

Drug & Alcohol Policy

This policy statement includes an employee acceptance and sign off sheet. Please take the time to read our policy and sign where indicated. If you have questions concerning any aspect of these documents, please consult your Tradesmen Manager immediately.

Employee safety and health are Tradesmen International's number one core value. Illegal drug and alcohol use are strictly prohibited on any job-site. Therefore, we expect all Tradesmen International employees to accept Tradesmen International's Drug & Alcohol Policy.

Purpose

1. To ensure that all Tradesmen International employees are provided a safe working environment free from illegal drug and alcohol use.
2. To assure our customers that we provide only safe, drug and alcohol-free skilled craftsmen.
3. To return our valued employees safely to their families each and every day.

Policy Statement

1. The manufacture, distribution, possession, or use of alcohol or any illegal drug while on Tradesmen International's property or any customer job-site, whether in work or non-work areas, during working or non-working hours, is prohibited and will subject the offending employee to discipline, up to and including termination.
2. It is the responsibility of each employee to promptly notify his or her supervisor of the use of any prescribed and/or over-the-counter medication that may affect judgment, performance, behavior, or otherwise impact the employee's ability to perform their job in a safe manner.
3. Any employee convicted of violating any criminal drug statute, which violation occurred on company or client's premises, may be subject to immediate termination, regardless of whether the underlying misconduct occurred in work or non-work areas, or during working or non-working hours.

Special Conditions

1. Any Tradesmen International employee who either causes or is injured as a result of any work-related accident must submit to a post-accident drug & alcohol test, where there is a reasonable basis to believe that drug and/or alcohol use by the employee may have played a role in the accident. An employee may be excused from the required test only where a) the employee did not seek outside medical treatment; and b) the excuse is approved by management.

Any Tradesmen International employee may also be subject to drug and alcohol testing where there is reasonable suspicion that drugs or alcohol have affected an employee's judgment, performance, behavior, or the safety of the employee or others. In addition, Tradesmen International employees may be subject to drug and alcohol testing where such testing is a prerequisite to working on or entering a particular worksite or where a Tradesmen client conducts random drug testing on the worksite. Tradesmen International employees will also be subject to drug and alcohol testing if such testing is required by applicable law.

2. The drug & alcohol test will be at no cost to the employee. Tradesmen International's designated medical provider or physician will administer this test.
3. Where necessary, all Tradesmen International employees are required to sign a HIPAA compliant medical consent form authorizing the medical provider to release drug and alcohol test results to Tradesmen International.
4. Any employee whose drug test yields a positive result for alcohol or illegal drugs will be subject to discipline up to and including termination. Any employee who refuses, evades or attempts to alter the results of a drug test will be subject to discipline, up to and including termination. Late reporting or non-reporting of a work-related accident will also result in discipline of the offending employee, up to and including termination.
5. To the extent that any portion of this policy conflicts with any applicable law, that applicable law will supersede any affected portion of this policy.

Tradesmen International encourages all of its valued employees who may have drug/alcohol problems to seek immediate professional assistance.



Tradesmen International's Drug & Alcohol Policy

I, _____, have read Tradesmen International's Drug & Alcohol Policy. I understand this policy and the reasons for it. Before starting employment with Tradesmen, I was given the opportunity to ask questions about the terms and conditions of the company's Drug & Alcohol Policy and agree to abide by this policy. Additionally, I have received copies of the Drug & Alcohol Policy and my signed acknowledgment form. I agree that should I report having sustained a work-related injury or illness, I will submit immediately to a post-accident drug & alcohol test whenever my injury/illness requires medical treatment, and/or Tradesmen or its client has a reasonable basis for believing that my drug/alcohol use could have contributed to the injury/illness. I likewise agree to submit immediately to a post-accident drug & alcohol test should I sustain a work-related injury that is observed and reported by a management representative of Tradesmen or its client. I also agree to submit immediately to drug and alcohol testing if Tradesmen or its client determine there is a reasonable basis for believing that drugs or alcohol have affected my judgment, performance, behavior, or my safety or the safety of others, if drug or alcohol testing is a prerequisite to working on or entering a particular worksite, if the Tradesmen client to whom I am assigned conducts random drug testing on the worksite, or if drug or alcohol testing is performed in compliance with a state Drug Free Workplace (DFWP) statute, a DFWP policy implemented pursuant to an arrangement with an insurance carrier, or otherwise required by law. I further understand and agree that by not reporting a work-related injury/illness within a reasonable timeframe after I realize that I have sustained a work-related injury or illness (unless due to incapacitation caused by the injury/illness),, by refusing or delaying immediate submission to any required drug & alcohol test, or by attempting to alter the test results, I will be subject to discipline, up to and including termination of my employment. I also agree to report to my supervisor any conviction for any criminal drug violation within five days.

Employee Signature: _____ Date: _____

Witness Signature: _____ Date: _____

All employees will receive a list and directional map of area medical providers. If you are injured on the job and are uncertain as to which medical provider you should see, contact your Field Office immediately. Always refer to your personal MEP (Medical Emergency Procedures) card for further information regarding accident treatment and post-accident drug & alcohol testing instructions.

REMEMBER, IF YOU ARE INJURED ON THE JOB AND EITHER 1) DO NOT REPORT THE INJURY WITHIN A REASONABLE TIMEFRAME (UNLESS DUE TO INCAPACITATION CAUSED BY THE INJURY); OR 2) REFUSE OR DELAY AN IMMEDIATE POST-ACCIDENT DRUG AND ALCOHOL TEST; OR 3) DILUTE OR OTHERWISE TAMPER WITH A SUBMITTED TEST SAMPLE THEN YOU MAY BE INELIGIBLE FOR WORKER'S COMPENSATION BENEFITS AND BE SUBJECT TO TERMINATION OF EMPLOYMENT.

(Signature of Tradesmen Representative)

Date: _____