



SECTION II

MILTON J. WOOD

DRUG FREE WORKPLACE
POLICY



DRUG FREE WORKPLACE POLICY

TO OUR EMPLOYEES

Dear Fellow Employee:

It is a fact of life that alcohol and/or drug abuse is widespread in today's society. Its causes are many and complex, but one thing is certain, the use, sale, purchase, dispensing, or possession of illegal drugs and/or the abuse of alcohol are inconsistent with the company's commitment to provide a safe and productive work environment for all of its employees and to continue to deliver the high quality products and services which have made us an industry leader.

While the Company has no intention of intruding into the private lives of its employees, we recognize that serious involvement with drugs and/or alcohol eventually takes its toll on job performance. Our concern is that employees report to work in condition to perform their duties safely and efficiently in the interest of our clients, our fellow workers, the company, and themselves. To this end, we have instituted a "drug free workplace program" and therefore are obligated to notify you that it is a condition of employment that you refrain from using drugs on or off the job and that a drug testing program has been implemented.

Hopefully, if we all do our part, our efforts will carryover into our community and reinforce our demonstrated concern for the health and safety of everyone.

Sincerely,

**MILTON J. WOOD COMPANY
MILTON J. WOOD FIRE PROTECTION, INC.**



PURPOSE:

The Company recognizes the dangers that the use of alcohol and/or drugs may have on the performance of its employees and on the safety and security of its work environment. In order to maintain productivity and especially, to protect the safety and well being of all employees, direct action must be taken when employees are under the influence of drugs and/or alcohol on a Company jobsite or Company property.

The Company recognizes that drug and/or alcohol abuse (SUBSTANCE ABUSE) is treatable and is committed to making an effort to assist current employees who may be experiencing problems due to substance abuse by helping them to understand and correct it, while supporting approved rehabilitation efforts.

The Company will have a drug and alcohol free workplace and the Company is obligated to establish and communicate its policy to all employees.

DEFINITIONS:

- Company Personnel - All company employees, agents, subcontractors or subcontractors' employees performing work for Milton J. Wood. This includes temporary and part-time employees
- Property - All real or tangible personal property, including facilities, buildings, vehicles, products and equipment, either owned or controlled by Milton J. Wood or its clients.
- Prohibited Substances - (1) Illicit or unprescribed drugs, controlled substances and mood or mind-altering substances (i.e. any synthetic derivative/product that produces a marijuana-type high or any herbal products not intended for human consumption) (2) prescribed drugs used in a manner inconsistent with the prescription and (3) alcoholic beverages.
- Reasonable Suspicion - A belief based on objective and articulable facts sufficient to lead a supervisor to suspect use of Prohibited Substances.
- Under the Influence - (1) The presence of a Prohibited Substance or metabolites of a Prohibited Substance in body fluids above commonly accepted cut-off levels and/or (2) the presence of a Prohibited Substance that affects an individual in any detectable manner. The symptoms of influence may be, but are not limited to, slurred speech or difficulty maintaining balance.

POLICY:

1. It is the policy of the Company to maintain a drug free workplace as a condition of continued employment. All employees must abide by the terms of this policy.
2. The use, sale, manufacture, distribution, purchase, possession, dispensing, or being under the influence of illegal drugs, non-prescribed controlled substances, prohibited substances, substances not for human consumption or alcohol on a Company jobsite, Company property, while on Company business, or while operating Company owned or leased vehicles and/or



equipment is strictly prohibited.

3. In order to detect the use of these substances as described above, employees may be directed to submit to a urinalysis drug test, a blood test, a saliva test and/or breath test. Individuals under the influence of alcohol or with illegal or non-prescribed controlled drugs, substances not for human consumption or prohibited substances in their system are in violation of this policy and will be subject to discipline, up to and including termination of employment.

The use of alcoholic beverages by Company employees on Company premises or on Company assignments may take place only during an approved Company function.

IMPORTANT NOTE:

The authorization of alcoholic beverages at such functions DOES NOT relieve employees from the responsibility of exercising moderation and judgement so as not to present a danger to themselves, other employees, the general public, or the company's reputation.

4. The use of legal drugs, prescribed by a licensed physician for a specific treatment, will not result in disciplinary action. Some prescriptions may have a direct impact on vigilance, judgement, and coordination. It is important, particularly in safety sensitive assignments involving the operation of vehicles or machinery, for example, for the Company to assure itself that there is not a threat to safety as a result of such medication. It is therefore imperative that any employee taking such medication(s) notify his supervisor and the drug free workplace administrator (hereinafter DFWP Administrator).
5. Employees experiencing problems as a result of substance abuse should contact the DFWP Administrator for referral of treatment and/or counseling. This discussion will be kept confidential and will have no influence on appraising an employee's work performance. Work performance alone will be evaluated, not the fact that the employee may be granted an unpaid medical leave to undertake drug or alcohol rehabilitation treatment. After consultation with the treatment facility's counselor(s), the DFWP Administrator will determine whether the employee may continue to work during treatment or whether an unpaid medical leave should be granted. Such employee must cooperate fully with the approved treatment and / or counseling program and if medical leave is granted, the employee will not be permitted to return to work until a satisfactory release from the treatment program is presented to the DFWP Administrator certifying that the employee is capable of returning to work and has met the requirements of the program to date. An employee who undergoes treatment under this policy will be required to sign and comply with the substance abuse commitment letter from the DFWP Administrator. Upon return to work, such an employee will be subject to periodic testing to verify recovery from substance abuse. Failure to take or pass a random test will result in discipline which may include termination of employment.
6. The Company may utilize a urinalysis drug test, blood test, hair, saliva and / or breath test under the following circumstances:



- 6-1 For all applicants prior to employment.
- 6-2 For current employees on a for cause basis where there is reasonable suspicion that an employee has violated this policy. Testing will only be done with the approval of two supervisors or one company supervisor and a member of the Management Team and / or the DFWP Administrator.
- 6-3 Random employee testing that shall equal or exceed 20% of the average number of employees at the discretion of Milton J. Wood or its clients.
- 6-4 Upon return to work following treatment for substance abuse, testing will be conducted on a periodic basis for up to three years and may include testing of the hair for drug use history.
- 6-5 Drug and/or alcohol testing will be required after an accident that results in
 - a fatality
 - bodily injury
 - damage or potential damage to any property or equipment
- 6-6 Follow up testing

If an employee is injured, the collection of samples will be completed as soon as the initial treatment is completed, in any case within thirty-two (32) hours after the accident.

Any and all uninjured employees involved in an accident as described above will be required to submit to drug and / or alcohol testing within 32 hours of the accident. If not completed within that time frame, such employee will be deemed to have refused to submit to a test for drugs and / or alcohol and will be subject to discipline up to and including termination of employment.

When there has been a determination by an attending law enforcement agency as to the degree of an employee's responsibility, and if drugs and / or alcohol are detected as a result of testing, the employee will be subject to discipline up to and including termination of employment depending on severity of the situation.

- 7. Any employee who is arrested, indicted, or convicted of a drug and / or alcohol related violation must report this information to the DFWP Administrator no later than five (5) days after such arrest, indictment, or conviction. Failure to notify the DFWP Administrator within the specified time period may result in termination. An employee who is convicted of a drug or alcohol related charge or an employee who is arrested or indicted for a drug or alcohol related charge, where an independent Company investigation finds a violation of this policy, will be subject to discipline up to and including termination of employment. An unpaid leave of absence may be considered depending upon the severity of the situation.
- 8. Initial Test. The initial screen for all drugs shall use an immunoassay. The following cutoff levels shall be used when first screening specimens to determine whether they are positive or negative for some or all of these drugs or metabolites. All levels equal to or exceeding the following shall be reported as positive:



Alcohol	.04%
Amphetamines	1,000 ng/ml
Cannabinoids	50 ng/ml
Cocaine	300 ng/ml
Phencyclidine	25 ng/ml
Methaqualone	300 ng/ml
Methamphetamines	1,000 ng/ml
Opiates	2,000 ng/ml
Barbiturates	300 ng/ml
Benzodiazepines	300 ng/ml
Synthetic Narcotics	
Methadone	300 ng/ml
Propoxyphene	300 ng/ml
Morphine	300 ng/ml
TCA	1,000 ng/ml
MDMA (Ecstasy)	500 ng/ml

A positive finding will generate a confirmation through GC/MS and the results will be kept confidential. A copy of any positive finding can be received by the subject employee by submitting his / her request in writing to the Medical Review Officer. Refusal to provide an adequate sample for testing under the terms of this policy may result in disciplinary action, up to and including termination of employment. Any employee discharged for violating this policy will not be eligible for re-hire for a period of one year.

9. When required the Company shall utilize a DOT / DOE Compliant Drug Free Workplace Program. This program shall be in strict adherence to regulatory guidelines and shall be separate from our standard Drug Free Workplace Program. (Copy of the program will be provided as needed.)

10. PROHIBITIONS

Unless specifically authorized in writing by the Company, this policy shall prohibit Company personnel from the following:

- A. Prohibited Substances – (1) Illicit or unprescribed drugs, controlled substances and mood or mind-altering substances (i.e. any synthetic derivative/product that produces a marijuana-type high and any herbal products not intended for human consumption), (2) Prescribed drugs used in a manner inconsistent with the prescription and (3) Alcoholic beverages.
- B. While on Company property or jobsite, possessing or using prescription drugs or over-the-counter medication that may cause impairment, except when **all** of the following conditions have been met:
 - i. Prescription drugs have been prescribed by a licensed physician for the



person in possession of the drugs.

- ii. The prescription is not expired and was filled by a licensed pharmacist for the person possessing the drugs.
 - iii. The individual notifies his / her supervisor that he / she will be in possession of, or using, impairment-causing prescription drugs or over-the-counter medication and appropriate steps are taken to accommodate the possibility of impairment, including but not limited to, removal from work for the period of possible impairment.
- C. Being under the influence of prohibited substances while performing any work for the Company or its customers.
 - D. Switching or adulterating any urine, blood or other sample used for testing.
 - E. Performing work for the Company or its customers when an individual has tested positive or refused testing in any employment related test.

11. SUPERVISOR TRAINING

The Company shall provide training regarding this policy. Training on the recognition of performance indicators of probable drug and / or alcohol use and on its effects and consequences to personal health, safety and the workplace shall be included. It is required that each supervisor who will determine whether an employee must be tested based on reasonable suspicion, receive at least one 60-minute training session on the specific, contemporaneous, physical, behavioral and performance indicators of probable drug and alcohol use. Records of individuals trained (including name and date) will be maintained by the Company.

12. SEARCHES AND INSPECTIONS

On Company property or Company jobsite, at any time, the Company or inspection specialists, including scent-trained animals, may conduct unannounced searches and inspections of Company personnel and their property. That property may include, but is not limited to, wallets, purses, lockers, baggage, offices, desks, toolboxes, clothing and vehicles.

13. EMPLOYEE ASSISTANCE PROGRAM (EAP)

The reasons for drug experimentation, such as curiosity and social pressure, are different than the reasons for occasional drug use. Dependence and fear of withdrawal are different still. The company and management will provide information on drug awareness to encourage abstinence from substance abuse.



DRUG ABUSE AND ALCOHOL ABUSE TREATMENT LOCATIONS

Gateway Community Services
555 Stockton Street
Jacksonville, FL 32204
904-387-4661

Ten Broeck Hospital
6300 Beach Boulevard
Jacksonville, FL 32216
904-724-9202

Greenfield Center
1820 Barrs Street
Jacksonville, FL 32204
904-389-3784

St. Vincent's Behavioral Health
Support Services
4160 University Boulevard South
Jacksonville, FL 32216
904-308-7900

Tri-County Human Services
1831 North Crystal Lake Drive
Lakeland, FL 33801
863-709-9392

Recovery Place of Savannah
835 East 65th Street
Savannah, GA 31405
912-355-1440

Coastal Harbor Treatment Center
1150 Cornell Avenue
Savannah, GA 31406
912-354-3911

Focus By The Sea
2927 Demere Road
St. Simons Island, GA 31522
912-638-1999

Contact the Drug Free Workplace Administrator for further assistance with the EAP Program.



OVER THE COUNTER AND PRESCRIPTION DRUGS WHICH ALTER OR AFFECT THE OUTCOME OF A DRUG TEST

ALCOHOL

All liquid medications containing ethyl alcohol (ethanol). Please read the label for alcohol content. As an example, Vick's Nyquil is 25% (50 proof) ethyl alcohol, Comtrex is 20% (40 proof), Contac Severe Cold Formula Night Strength is 25% (50 proof) and Listerine is 26.9% (54 proof).

AMPHETAMINES

Obetrol, Biphedamine, Desoxyn, Dexedrine, Didrex

CANNABINOIDS

Marinaol (Dronabinol, THC)

COCAINE

Cocaine HCl topical solution (Roxanne)

PHENCYCLIDINE

Not legal by prescription

METHAQUALONE

Not legal by prescription

OPIATES

Paregoric, Parepectolin, Donnagel PG, Morphine, Tylenol with Codeine, Empirin with Codeine, APAP with Codeine, Aspirin with Codeine, Robitussin AC, Guaiatuss AC, Novahistine DH, Novahistine Expectorant, Dilaudid (Hydromorphone), M-C Contin and Roxanol (morphine sulfate), Percodan, Vicodin, etc.

BARBITURATES

Phenobarbital, Tunial, Amytal, Nembutal, Seconal, Lotusate, Fiorinal, Fiorcet, Esgis, Butisol, Mebaral, Butabarotal, Butabital, Phrenilin, Triad, etc.

BENZODIAZEPINES

Ativan, Azene, Clonopin, Dalmane, Diazepam, Librium, Xanax, Serax, Tranxene, Valium, Verstran, Halcoin, Paxipam, Restoril, Centrax.

METHADONE

Dolphine, Methadose

PROPOXYPHENE

Darvocet, Darvon N, Dolene, etc.



AUTHORIZATION FOR USE OF DISCLOSURE OF MEDICAL INFORMATION

This authorization for use or disclosure of medical information is being requested of you to comply with the terms of the Confidentiality of Medical Information Act of 1981.

I hereby authorize the Medical Review Officer, any counselor, or treatment facility I may be referred to and the testing laboratories to furnish the Company with results of all tests run. The Company may use the medical records and type of information authorized only for the following purpose: To determine my ability to perform my job and my qualifications for employment or continued employment and to defend the company in any legal proceedings in which my employment or actions are at issue.

This authorization shall become effective immediately and shall remain in effect throughout the duration of my employment with the Company.

I understand that the DFWP Administrator may not further use or disclose the medical information unless another authorization is obtained from me or in case of post accident testing or disclosure is specifically required or permitted by law.

I further understand that I have a right to receive a copy of this authorization upon my request.

CONSENT FORM FOR DRUG TESTING

By signing the consent form on the back of the Company W-4, the employee:

- Understands that the Company has a policy against the use, possession, or distribution of illegal drugs and / or alcohol by its employment applicants and employees. He/she further understands that the Company has adopted a drug testing program as one method of implementing that policy.
- Consents to the taking of urine, saliva, hair or blood samples by the Company or its agents for the purpose of the above drug testing program and to the testing of such samples by the drug testing laboratory designated by the Company.
- He / she hereby further consents to the release of any test reports on such samples or other related medical information from the laboratory to the DFWP Administrator of the Company and to the use of all such reports or other information in the Company's assessment of his / her employment application, employment status and / or any legal proceedings arising out of his / her employment or as a result of any accident.

This authorization shall become effective immediately upon signing the W-4 and shall remain in effect throughout the duration of his / her employment with the Company. He / she also has a legal right under the Confidentiality of Medical Information Act to receive a copy of the consent form.