

# Drug-Free Workplace Policy

## **Purpose and Goal**

**Greystone Properties, LLC and WLB, LLC** are committed to protecting the safety, health and well-being of all employees and other individuals in our workplace. We recognize that alcohol abuse and drug use pose a significant threat to our goals. We have established a drug-free workplace program that balances our respect for individuals with the need to maintain an alcohol and drug-free environment.

**Covered Individuals** Any individual who conducts business for the organization(s), is applying for a position or is conducting business on the organization's property is covered by our drug-free workplace policy. Our policy includes, but is not limited to executive management, managers, supervisors, all employees and employment applicants.

**Applicability** Our drug-free workplace policy is intended to apply whenever anyone is representing or conducting business for the organization. Therefore, this policy applies during all working hours and whenever conducting business or representing the organization.

## **Prohibited Behavior**

1. The use of illegal drugs is a violation of company policy.
2. It is a violation of company policy for any employee to possess, sell, trade or offer for sale illegal drugs or otherwise engage in the illegal use of drugs.
3. It is a violation of company policy for anyone to report to work under the influence of illegal drugs.
4. It is a violation of company policy for anyone to use prescription drugs illegally. However, nothing in this policy precludes the appropriate use of legally prescribed medicines, provided they do not interfere with the employee's ability to work.
5. It is a violation of company policy to consume alcoholic beverages on this company's premises during working hours or to report to work with an alcohol concentration in excess of .08 grams.
6. Violations of this policy are subject to disciplinary action up to and including termination.

**Types of Testing** Greystone has adopted testing practices to identify employees who use illegal drugs or who use alcohol on the job. It will be a condition of employment for all employees to submit to substance abuse testing under the following circumstances:

1. Pre-employment: Employment applicants will be required to submit to a substance abuse test after extending an offer of employment.
2. Reasonable suspicion: Reason to believe that an employee is using illegal drugs or is otherwise under the influence of drugs or alcohol, based on belief that an employee is using or has used drugs or alcohol in violation of the employer's policy, drawn from specific, objective facts or reasonable inferences.
3. Post-accident:
  - (a) When employee has been involved in, caused or contributed to an accident resulting in damage to company property.
  - (b) Prior to treatment for an on-the-job injury at a medical facility.
  - (c) Injuries that occur during work hours must be reported immediately to Human Resources, where it will be determined whether or not employee is required to seek treatment at a medical facility.
4. Random: As part of a random screening program.
5. Post-Rehabilitation: As a part of a follow-up to a program of treatment for drug or alcohol abuse.

**Testing Procedures** To ensure the accuracy and fairness of our testing program, all substance abuse testing will be conducted in accordance with the following procedures:

1. The substances that will be tested for are: Amphetamines, Cannabinoids (THC), Cocaine, Opiates, Phencyclidine (PCP), Barbiturates, Benzodiazepines, Methadone, Propoxyphene, and alcohol concentration of .08 grams or higher.
2. Testing for the presence of the metabolites of drugs will be conducted by the analysis of urine.
3. A specimen shall be collected with due regard to the privacy of the individual providing the specimen and in a manner reasonably calculated to prevent substitution or contamination of the specimen
4. Specimen collection shall be documented, and the documentation procedures shall include:
  - a) Labeling of specimen containers so as to reasonably preclude the likelihood of erroneous identification of test results; and
  - b) An opportunity for the employee or job applicant to record any information he or she considers relevant to the test, including identification of currently or recently used prescription or nonprescription medication or other relevant medical information. The providing of information shall not preclude the administration of the test, but shall be taken into account in interpreting any positive confirmed results;
5. Specimen collection, storage, and transportation to the testing site shall be performed in a manner which will reasonably preclude specimen contamination or adulteration;
6. Each initial test conducted shall be conducted by a laboratory;
7. A specimen for a test may be taken or collected by any of the following persons: A physician, a physician's assistant, a registered professional nurse, a licensed practical nurse, a nurse practitioner, a certified paramedic who is present at the scene of an accident for the purpose of rendering emergency medical service or treatment; a qualified person certified or employed by a laboratory certified by the National Institute on Drug Abuse, the College of American Pathologists, or the Georgia Department of Community Health; A qualified person certified or employed by a collection company.

**Testing Positive** One of the goals of our drug-free workplace program is to encourage employees to voluntarily seek help with alcohol and/or drug problems. If, however, an individual violates the policy, the consequences are serious.

Employees or applicants with a confirmed positive test result may, at their option and their expense, have a second confirmation test made on the **same** specimen within five (5) working days after the company contacts the employee regarding the positive test result. The individual will not be allowed to submit another specimen for testing. The individual has the option of explaining the positive result to the employer. If individual chooses to exercise this option, and if a valid prescription can be provided to explain the positive result, it must be provided to the laboratory within five working days after written notification of the test result.

1. In the case of applicants, if he or she violates the drug-free workplace policy, the offer of employment will be withdrawn. The applicant may reapply after eighteen months.
2. Any employee required to undergo testing pursuant to this policy which test results in a confirmed positive, will be immediately terminated from employment.
3. An employee may be subject to the same consequences of a positive test if he/she refuses the screening or the test, adulterates or dilutes the specimen, substitutes the specimen with that from another person or sends an imposter, will not sign the required forms or refuses to cooperate in the testing process in such a way that delays or prevents completion of the test.

**Alcohol** An employee whose normal faculties are impaired due to the consumption of alcoholic beverages, or whose blood alcohol level tests .08 grams or higher, while on duty shall be guilty of misconduct. It is a violation of company policy to consume alcoholic beverages on this company's premises during working hours. Violations to this policy shall be subject to discipline up to and including termination.

### **Assistance**

**Greystone Properties, LLC and WLB, LLC** recognizes that alcohol and drug abuse and addiction are treatable illnesses. We also realize that early intervention and support improve the success of rehabilitation. To support our employees, our drug-free workplace policy:

- Encourages employees to seek help if they are concerned that they or their family members may have a drug and/or alcohol problem.
- The employer provides an Employee Assistance Program (EAP) for eligible employees and their eligible dependents. The EAP is a confidential service to help employees with personal concerns which may affect work performance. The services, which are provided by the Pastoral Institute, include evaluation, counseling, and referral services. Details regarding the employer's EAP are available to all employees on the company intranet and in the employee policy manual, located in each management office.
- Treatment for alcoholism and/or other drug use disorders may be covered by the employee benefit plan. However, the ultimate financial responsibility for recommended treatment belongs to the employee.
- Upon disclosure of such circumstances to the organization, the employee and organization will work within the confines of the organization's policy to create treatment options which will allow the employee the opportunity to receive appropriate treatment and return to work at such time that it is determined that the condition has been adequately addressed.

**Confidentiality** All information received by the organization through the drug-free workplace program is confidential communication. Access to this information is limited to those who have a legitimate need to know in compliance with relevant laws and management policies.

**Notification of Convictions** Any employee who is convicted of a criminal drug violation in the workplace, or any felony criminal drug conviction wherever occurring, must notify the organization in writing within five calendar days of the conviction. The organization will take appropriate action within 30 days of notification. Federal contracting agencies will be notified when appropriate.

**Searches** Entering the organization's property constitutes consent to searches and inspections. If an individual is suspected of violating the drug-free workplace policy, he or she may be asked to submit to a search or inspection. Searches can be conducted of pockets and clothing, wallets, purses, briefcases and lunchboxes, desks and work stations and vehicles and equipment.

**Shared Responsibility** A safe and productive drug-free workplace is achieved through cooperation and shared responsibility. Both employees and management have important roles to play.

All employees are required to not report to work or be subject to duty while their ability to perform job duties is impaired due to on- or off-duty use of alcohol or other drugs. In addition, employees are encouraged to:

- Be concerned about working in a safe environment.
- Support fellow workers in seeking help.
- Use the Employee Assistance Program.
- Report dangerous behavior to their supervisor.

It is the supervisor's responsibility to:

- Inform employees of the drug-free workplace policy.
- Observe employee performance.
- Document negative changes and problems in performance.
- Counsel employees as to expected performance improvement.
- Clearly state consequences of policy violations.

**Communication** Communicating our drug-free workplace policy to both supervisors and employees is critical to our success. To ensure all employees are aware of their role in supporting our drug-free workplace program:

- All employees will receive a written copy of the policy.
- The policy will be reviewed in orientation sessions with new employees.
- Posters and brochures will be available at all locations.
- Employee education about the dangers of alcohol and drug use and the availability of help will be provided to all employees.
- Every supervisor will receive training to help him/her recognize and manage employees with alcohol and other drug problems.