

Drug and Alcohol Policy – NASAP

January 2023

NASAP Alcohol, Drugs and Controlled Substances Company Policy

- 1-1 **PURPOSE:** IPS★ITCS is committed to the maintenance of a safe and productive working environment for employees and others that may come into contact with our facilities and employees. Because the use of alcohol, illegal drugs and controlled substances has been shown to substantially increase workplace accidents and reduce employee dependability and productivity, the following policy is implemented to safeguard the health of our employees and others, and to provide a safe, healthy, and productive working environment. **Compliance with this policy is a condition of employment.** IPS★ITCS will not assume any risk created by the presence of illegal drugs, alcohol, and controlled substances in the workplace.

IPS★ITCS and its customers reserves the right, at all times, to conduct searches or inspections, without prior announcement, of the personal effects, lockers, baggage and vehicles of any person subject to this policy, for the purpose of determining if such person is in possession of a prohibited item or substance. Illegal and unauthorized items include, but are not limited to illegal drugs, narcotics, look-alike and designer drugs, controlled substances, contraband such as drug-related paraphernalia and alcohol.

- 1-2 **SCOPE:**

This policy applies to all employees of IPS★ITCS, contract employees, contractors, including their employees, and all applicants for employment.

- 1-3 **POLICY:**

A. Prohibition Against Presence of Alcohol, Illegal Drugs and Controlled Substances:

To ensure a safe, productive work environment and to safeguard IPS★ITCS property, IPS★ITCS strictly prohibits the use, sale, transfer or possession of alcohol, illegal drugs, drug paraphernalia or controlled substances on IPS★ITCS premises, work sites, or customer premises. IPS★ITCS vehicles, as well as private vehicles parked on IPS★ITCS premises, work sites, or customer premises, are locations included within the prohibition. Additionally, IPS★ITCS strictly prohibits any person with any detectable amount of illegal drugs or controlled substances present in his/her body from being on IPS★ITCS premises, work sites, or customer premises, under the influence of alcohol or with any detectable amount of illegal drugs, controlled substances, and/or alcohol present in his/her body.

Any non-employee (including visitors, contractors, employees of contractors, etc.) found in violation of this policy, or suspected of being impaired under the influence of alcohol or who has a detectable amount of illegal drugs, controlled substances, and/or alcohol present in his/her body, may be refused entry onto or removed from IPS★ITCS' premises and denied future access.

Furthermore, depending on the circumstances, other action, including notification of appropriate law enforcement agencies, may be taken against any violator of this policy.

B. Legal Drugs:

Any employee taking a drug or other medication, whether or not prescribed by a physician, which is known or advertised as possibly affecting or impairing judgment, coordination, or other senses, or which may adversely affect ability to perform working in a safe and productive manner, must notify his/her supervisor prior to starting work or entering the IPS★ITCS' premises, work site, or Customer premises. The Supervisor will decide if the employee can remain at work and what work restrictions, if any, are deemed necessary or appropriate. Any employee violating this policy is subject to disciplinary action up to and including discharge.

C. Testing:

IPS★ITCS requires all applicants for employment to submit to testing for illegal drugs and alcohol as part of their pre-employment process. Employment is conditional upon passing this test.

Employees must report to the testing site immediately once notified to submit to a drug and/or alcohol test. Failure to follow this policy will be considered a positive test result.

IPS★ITCS also may require any employee to submit to testing for illegal drugs and alcohol in the following circumstances:

1. **Pre-employment** - Whenever an applicant is hired or contracted to perform work for IPS★ITCS or its customers.
2. **Return to work from a personal leave of absence.**
3. **Post- Accident** - Following any accident regardless of fault where property damage occurred or an injury where medical attention is required. This includes all employees involved. After returning from the collection site, the employee(s) shall not be allowed to perform safety sensitive duties pending the results of the test in writing.
4. **Pre-Access** - Whenever required or requested by a customer of IPS★ITCS as a condition for entering the customer's premises or performing services for the customer. (If an employee has positive results during a pre-access test, the employee will not be permitted to enter the customer's premises.)
5. **Reasonable Cause** - Whenever an employee is suspected of violating this policy. After returning from the collection site, the employee shall not be allowed to perform safety sensitive duties pending the results.
6. **Random** - On a random selection basis and anytime deemed appropriate by the senior management of IPS★ITCS, without prior announcement.

Employees are required to sign a written consent to a drug/alcohol test. Any employee who refuses consent to a required drug/alcohol test will be terminated. The purpose of the test is to determine whether a person has any detectable amount of illegal drugs, alcohol or any controlled substance presenting his/her body.

The following substances in the indicated amounts are considered by this policy to be prohibited:

APPENDIX II

DRUG AND ALCOHOL PANEL

	SCREENING CUT-OFF (g/dL)	CONFIRMATION CUT-OFF (g/dL)
ALCOHOL	0.02	0.04
DRUG CLASS ANALYTES	SCREENING CUT-OFF (ng/mL)	CONFIRMATION CUT-OFF (ng/mL)
AMPHETAMINES	300	
AMPHETAMINE		250
METHAMPHETAMINE		250
ECSTASY	300	
MDMA		250
MDA		250
MDEA		250
BARBITURATES	300	
AMOBARBITAL		200
BUTALBITAL		200
PENTOBARBITAL		200
PHENOBARBITAL		200
SECOBARBITAL		200
BENZODIAZEPINES	300	
ALPRAZOLAM METABOLITES		100
NORDIAZEPAM		100
OXAZEPAM		100
ETHYLFLURAZEPAM METABOLITES		100
LORAZEPAM		100
TRIAZOLAM METABOLITES		100
COCAINE METABOLITES	150	
BENZOYLECGONINE		100
MARIJUANA METABOLITES	20	
THCA (11-nor delta-9THCA)		10
METHADONE	300	
METHADONE		200
EDDP		200
METHAQUALONE	300	
METHAQUALONE		200
OPIATES	300	
MORPHINE		100
CODEINE		100
HYDROMORPHONE		100
HYDROCODONE		100
OXYCODONES	100	
OXYCODONE		100
OXYMORPHONE		100
6-ACETYLMORPHINE (6-AM)		10
PHENCYCLIDINE (PCP)	25	25
PROPOXYPHENE	300	200
SYNTHETIC THC*	See Panel List	See Panel List

* Must use the most stringent market panel and include at minimum the compounds and associated testing metabolites specified in Appendix III - ** Any indication will be considered a positive

APPENDIX III

SYNTHETIC THC PANEL

Minimum Requirements for Synthetic THC Testing and Must Include These Minimum Compounds and Associated Testing Metabolites.

Parent Compound	Required Urine Testing Metabolite	Maximum Screening and Confirmation Cutoff Levels (ng/mL)
JWH-018/AM-2201	JWH-018 N-pentanoic acid	0.2
JWH-073	JWH-073 N-butanoic acid	0.2
UR-144	UR - 144 N-pentanoic acid	0.5
XLR-11	XLR11- N-4-hydroxypentyl	0.2
AKB-48 - (APINACA)	AKB48 N-pentanoic acid	2.5
BB-22	BB-22-3-carboxyindole	5
PB-22 - (CUPIC)	PB-22-3-carboxyindole	5
5-Fluoro-PB-22 - (5F-PB-22)	5-Fluoro PB-22-3-carboxyindole	5
5-Fluoro-PB-22 - (5F-PB-22)	AB – FUBNACA oxobutanoic acid	2.5
ADB-PINACA	ABA- PINACA N- pentanoic acid	5
AB CHMINACA	AB CHIMINACA 3-methyl- butanoic acid ("M2")	2.5
AB PINACA/5-F-AB-PINACA	AB PINACA N-pentanoic acid	5
ADBICA	ABICA N-pentanoic acid	5

Exceptions: Substances with a prescription.

Positive Results: All test results showing positive with a preliminary screen will be confirmed by using the G.C./ M.S. methodology. Any employee that has a question concerning the drug testing process, including the method to confirm a positive result should contact IPS★ITCS' Safety Department.

D. Consequence of Positive Results:

Employees in violation of this policy will be terminated for cause from IPS★ITCS and will not be eligible for re-hire for a period of twelve (12) months from termination date.

1.1 ACKNOWLEDGEMENT OF RECEIPT AND EXPLANATION

Each employee is to receive a copy of IPS★ITCS' policy regarding illegal drugs and prohibited substances in the workplace. Any questions regarding this policy should be directed to the Safety Department.

It is understood that continued employment with IPS★ITCS is conditioned on the employee's acceptance of and the compliance with the provisions of this policy. Failure to sign and return this alcohol, drugs and controlled substance acknowledgement form in no way reduces or removes responsibility for compliance with the above referenced policy, and that any violation of this policy will result in immediate termination of employment.

It is further understood that nothing in this policy is intended to alter or restrict any employee's right or IPS★ITCS' right to terminate the employment relationship at will.

1.2 EMPLOYEE ACKNOWLEDGMENT OF POLICY

By the initials appearing at the top of each page and by the signature below, the named employee acknowledges having been informed of the IPS★ITCS policy on **ALCOHOL, DRUGS AND CONTROLLED SUBSTANCES**, prior to signing the Drug Testing Consent & Release Form or submitting to the employment prerequisite drug screen.

Employee Printed Name: _____

Location: _____

Employee Signature: _____

Date: _____

Revision History

Rev	Rev Date	Rev By	Approved By	Description
1.0	1.3.2022	Shayne Torrans	Shayne Torrans	Initial Procedure Document
1.1	11.23.2022	Shayne Torrans	Shayne Torrans	Format Revision

Approvals:

Procedure Owner

Competency Assessment

No.	Questionnaire	C/NYC
Q1		
A1		
Q2		
A2		
Q3		
A3		
Q4		
A4		
Q5		
A5		

Enclosed Attachments	
Risk Assessment	<input checked="" type="checkbox"/>
Environmental Aspect and Impact	<input checked="" type="checkbox"/>
Training and Competency	<input checked="" type="checkbox"/>
Measure and Evaluation Tools	<input checked="" type="checkbox"/>

Competency Checklist

To be filled out by Trainer and signed by Employee, Assessor and Supervisor before being returned to the HSEQT Manager for recording purposes.

Procedure	Competency	Date	Competent YES / NO	Employee Signature

(Please tick appropriate box)

This employee is competent in performing the job.

This employee has not attained the competency level.

*

* *If the employee has not attained all competency levels, the General Manager must assess the action to be taken, provide an extension of training or alternative action as listed below.*

Alternate action to be taken: _____

Signed By	Employee:	Date:
	_____	_____
	Trainer:	Date:
	_____	_____
	Assessor:	Date:
	_____	_____
	Regional Manager:	Date:
	_____	_____

Environmental Aspects and Impacts

Identified Environmental Aspects and Impacts

The following table is a summary of the likely environmental aspects and impacts that may be identified during site inspections. The significance of each impact needs to be assessed using the Risk Assessment Model.

Activity	Aspect	Impact
Purchasing & Administrative Work	Consumption of goods	Conservation of natural resources
	Consumption of energy (eg. Electrical equipment and facilities)	Release of greenhouse gases and atmospheric pollution; Consumption of natural resources; Habitat loss
	Generation of waste (eg. Paper)	Consumption of space for waste disposal; Habitat loss
Climate Control	Consumption of energy	Release of greenhouse gases and atmospheric pollution; Consumption of natural resources; Habitat loss
	Generation of noise	Disturbance to community; Habitat loss
Cleaning of – offices / vehicles	Storage, use and release of chemicals	Contamination of air, water or soil; Risk to human health
Transport (Fleet vehicles / staff travel)	Consumption of energy	Release of greenhouse gases and atmospheric pollution; Consumption of natural resources; Loss of habitat at all stages of generation; Light pollution
	Consumption of goods (eg. Oil)	Consumption of natural resources; Generation of waste; Habitat loss; Biodiversity impacts
	Generation of waste (eg. Oil)	Consumption of space for waste disposal; Potential contamination of water or soil; Habitat loss
	Exhaust emission	Release of greenhouse gases and atmospheric pollution
	Use of dangerous goods (eg. Batteries)	Potential contamination of air, water or soil; Risk to human health
	Generation of noise	Disturbance to community; Habitat degradation
Operations		

Sample only.
To be filled in

Risk Assessment

Risk Assessment // insert name here

<p>Step No: Logical sequence</p>	<p>Sequence of Basic Job Steps documented in the Procedure, Work Instruction and project plans. Break down Job into steps.</p> <p>Each step should be logical and accomplish a major task.</p>	<p>Potential Safety & Environmental Hazards/Impacts at the site of the Job</p> <p>Identify the actual and potential health and safety hazards and the environmental impacts associated with each step of the job.</p>	<p>Risk Rating</p> <p>Refer to the risk matrix or HSEQT.PRO. Risk Mgt</p>	<p>Recommended Corrective Action or Procedure</p> <p><i>Determine the corrective actions necessary to reduce the risk to as low as reasonably practical (ALARP) refer to HSEQ.PRO.Risk Mgt. The risk must be reduced or controlled to ALARP before work commences.</i></p> <p>Document who is responsible for implementing the controls to manage each hazard identified.</p>	<p>Risk Rating refer to the risk matrix or HSEQT.PRO.Risk Mgt</p>
1.					
2.					
3.					
4.					
5.					

Audit



Process: insert// Procedure: Insert //		Date:		Audited by:	
		Location of Audit:		Area Mgr/Supervisor:	
Item	Question	Evidence Sited	Comments		Conformance Score 0,3,5
1.					
2.					
3.					
4.					
5.					
6.					
7.					
AUDITOR'S SIGNATURE:		CONFORMANCE SCORE: / 25		0 – Non-Conformance	
SAFETY REP'S SIGNATURE:		CONFORMANCE %:		3 – Continuous Improvement Opportunity	
				5 – Total Conformance	