

## Drug And Alcohol-Free Policy

Employees are prohibited from using, being impaired by, or being under the influence of, alcohol, marijuana, or illegal drugs while working (onsite, remotely or otherwise) or while on Company premises, except as noted below with respect to alcohol.

For purposes of this policy, “illegal drugs” means and includes (a) any drugs which are illegal under federal, state or local law or (b) legally prescribed drugs not prescribed to the user or (c) even where prescribed to the user, abuse or use of said drugs in a manner inconsistent with the prescription or purpose for which the drugs were prescribed. Furthermore, the possession, sale, or use of illegal drugs or controlled substances without a prescription at any time is prohibited.

Employees are prohibited from (1) consuming alcohol while working or while on Company premises and/or (2) working while under the influence of alcohol except during client entertainment events or gatherings hosted and approved by the Company. When consuming alcohol during such events, employees are required to limit consumption and to maintain professional behavior at all times. The employee – not the Company - shall be responsible for monitoring the employee's alcohol intake and behavior. Employees are also strictly prohibited from driving or otherwise operating a vehicle while or after consuming alcohol at a Company-sponsored or client event. Employees must take public transportation or an Uber, Lyft or other car service or taxi home.

UNDER NO CIRCUMSTANCE SHALL COMPANY BE LIABLE FOR EMPLOYEE’S CONSUMPTION OF ALCOHOL OR ACTS RESULTINGS THEREFROM, EVEN AT A COMPANY SPONSORED EVENT.

Upon reasonable suspicion, applicants for new positions and employees may be requested at any time without notice and as a condition of employment to submit to a test to determine whether they are under the influence of alcohol or illegal drugs. Further, the Company reserves the right at any time, without notice, to search Company-owned property for illicit substances, even if that property is being used exclusively by an employee. Employees have NO EXPECTATION OF PRIVACY in any Company-owned, leased, operated or utilized briefcases, desks, lockers, storage units, or containers.

Refusal to submit to a property search or an alcohol/drug test or drug test procedure is considered a violation of this policy and insubordination and may result in discipline, including termination.

Employees are also required, as a condition of employment, to notify their supervisor within 5 calendar days of any workplace-related criminal drug convictions in which they were involved. A conviction means a finding of guilt, including a plea of *nolo contendere*, or imposition of a sentence or both by any judicial body charged with the responsibility to determine violations of the federal or state drug statutes. If an employee’s position requires that he/she/they operate a motor vehicle in connection with their job duties, the employee must notify the Company of any DUI/DWI, alcohol-related conviction or driver's license restriction.

If you are taking any legal drug, whether over-the-counter or prescribed by a physician, that may alter your ability to safely perform your job duties without risk of harm to yourself or others, you

must report this to Human Resources immediately to determine whether reasonable accommodations can be made, which will allow you to work safely.

A disabled applicant or employee who may require a reasonable accommodation related to this policy must make a written request for accommodation to Human Resources BEFORE the employee is found to be in violation of this policy. The Company will not discriminate against an employee solely because an individual is a registered qualifying medical cannabis patient, unless doing so would cause the Company to violate federal law, lose a licensing-related benefit pursuant to federal law, or lose a federal contract or federal funding as a result.

Please note that even if accommodations may be made, employees are never permitted to be under the influence of alcohol or illegal drugs while working or while on Company premises.

Employees who violate any part of this policy are subject to immediate termination of employment.