

Alcohol & Drug Free Workplace Statement

This policy applies to all employees of ERG, without exception.

Our employees are our most valuable resource, and their safety and health is of paramount concern. ERG is committed to providing a safe working environment to protect our employees and others, to provide the highest level of service, and to minimize the risk of accidents and injuries.

Every employee has a responsibility to co-workers and our clients to deliver services in a safe and conscientious manner. Continuing research and practical experience have proven that even limited quantities of illegal drugs, abused prescription or over-the-counter drugs, or excessive amounts of alcohol can impair your reflexes and judgment. Impairment can have serious negative consequences in the workplace, including serious injuries. For these reasons, ERG has implemented a policy that all employees must report to and remain at work free from the presence or effects of illegal or abused drugs and unimpaired by alcohol consumption.

Abused Drugs include:

- Prescription drugs when either used without a prescription or used with a prescription but not in the manner prescribed; and
- Over-the-counter drugs that may affect an individual's mood, senses, responses, motor functions, or alter or affect an individual's perception, performance, judgment, reactions, or senses that are not used in accordance with the instructions or doses.

Alcohol includes any intoxicating beverages.

Contraband includes, but is not limited to, firearms, explosives, fireworks, or ammunition.

What Constitutes a Violation of the Policy?

Any employee who manufactures, cultivates, distributes, dispenses, possesses, uses or has in their system illegal or abused drugs while working at ERG offices or while performing ERG business away from ERG offices, including driving while in the scope of employment, is in violation of this policy.

Any employee, who has excessive amounts of alcohol in their system while at ERG offices or while performing ERG business away from ERG offices, including driving while in the scope of employment, is in violation of this policy.

Any employee in the possession of contraband while at work at ERG offices or while performing ERG business away from ERG offices, including driving while in the scope of employment, is in violation of this policy.

Employer Action

ERG managers may take disciplinary action upon reasonable suspicion that an employee has violated this policy. For purposes of this policy, reasonable suspicion is defined as a belief,

based on observed, specific, objective facts where a rational inference can be drawn that an employee is under the influence of drugs or alcohol, or in possession of contraband. An unexplained workplace accident will automatically be deemed as reasonable suspicion. If reasonable suspicion exists that an employee is under the influence of drugs or alcohol or in the possession of contraband, the following steps should be taken:

1. Escort the employee to a private area to inquire about the behavior under suspicion;
2. If possible, call in another supervisor or manager who can serve as a reliable witness;
3. Inform the employee of your concerns and get his or her explanation;
4. After the employee's response, arrange for the employee to be escorted home if appropriate;
5. Notify senior management;
6. Discuss whether any further investigation is required and if so the scope of the investigation; and
7. Decide what, if any, disciplinary measures should be taken, then notify the employee.

Employees who violate this policy are subject to disciplinary action ranging from being dismissed for the day up to and including immediate termination of employment.

ERG sponsors an Employee Assistance Program (EAP). ERG's EAP is available to ERG employees and their immediate family members. The EAP offers confidential counseling and, if necessary, or requested by ERG, can refer employees to substance abuse rehabilitation programs. In addition to the usual forms of discipline, up to and including termination, an employee who violates this policy may be required to participate in a rehabilitation program as a condition of continued employment.

Reporting a Drug Related Criminal Conviction

As with any criminal conviction arising out of conduct in the workplace, employees convicted of a drug-related offense occurring at work must notify their manager of the conviction. For drug-related offenses that occur at the work site, ERG may be required to report the conviction to the federal government.