

Purpose

Watco's Drug and Alcohol Testing Program outlined below is a furtherance to its commitment to its Team Members and their families. This commitment by Watco, is to do everything we can to ensure that our Team Members work in a safe environment, and return home safely at the end of the day. Although this policy addresses most situations, Watco will handle situations not specifically identified as it deems appropriate.

Watco strictly prohibits the use, sale, solicitation, or transfer of drugs, drug paraphernalia, other controlled substances, or alcohol on company premises (including parking lots) and company work sites. Watco also prohibits any Team Member from being at work under the influence of drugs or alcohol. This prohibition includes the operation of any Watco vehicle, equipment and private vehicles used for work purposes. If a prescription drug is being taken that prohibits the Team Member from performing their job duties with or without restrictions it should be reported to their supervisor.

Types of Drug and Alcohol Screens

Pre-Employment

Watco requires that prior to being employed, all new hires must submit to a pre-employment test for Drugs and/or Alcohol. Any positive result on a pre-employment drug or alcohol screen will result in Watco rescinding that new hire's offer letter, unless to do so would be a violation of state or federal law.

Reasonable Suspicion

Watco managers are expected to remain diligent at all times and monitor their operations to ensure that there are not violations of this policy. If a manager suspects that there is a violation of this policy by a Team Member while at work, the manager should take the following steps:

- If a manager detects the odor of alcohol on a Team, or if a manager believes that a Team Member is under the influence of drugs and alcohol based on observed behavior(s) as identified in the Signs and Symptoms Checklist, that Team Member will be removed from service and he/she will be required to complete the appropriate testing for alcohol and/or drugs. In all cases the Team Member will remain out of service until the results of the substance abuse testing have been received. If the result of this test is negative, the Team Member will be made whole for time lost.
- Team members who are suspected to have violated, or who have violated the Drug and Alcohol policy, or appear to be under the influence of alcohol or drugs, will not be permitted to drive their personal vehicle or any other vehicle from Watco's property.

Random

Watco Team Members will be subject to random, unannounced drug and/or alcohol tests at all times, and should always assume that they are going to be tested.

Post Accident

At the discretion of Watco, we may test Team Members who are involved in on-the-job accidents or incidents.

Positive Results and Consequences

Safety-Sensitive

For those Team Members in positions that Watco determines to be “safety sensitive,” Watco will handle positive drug or alcohol tests in accordance with the applicable law for the state in which you work. A positive result on a drug or alcohol test may result in the immediate termination of your employment. At Watco’s sole discretion, you may be allowed a one-time referral to a Substance Abuse Professional (SAP). If Watco makes the decision to refer you to a SAP, you may be rehired upon successful completion of the assigned program.

Non-Safety-Sensitive

For those Team Members in positions that Watco determines to be non-safety-sensitive, Watco will handle positive drug or alcohol tests in accordance with the applicable law for the state in which you work. Watco may also make the decision in these cases to offer Team Members a one-time referral to an SAP.

Miscellaneous Handling

The following situations may also result in the immediate termination of your employment:

- Refusal to submit to new-hire, random, reasonable suspicion, or post-accident testing upon Watco request.
- Tampering with any sample, attempting to tamper with any sample, or attempting to alter any variable in the testing process to tamper with the test or generate a false result.
- If you have been found to possess, or be under the influence of a substance that impairs mind or body, and can’t be detected by a drug test, Watco will investigate these cases and issue a determination.

Self-Referral and Co-Worker Referral Program

Team members who may have a drug or alcohol problem should, before the problem is found through testing, talk to their manager, who will refer the Team Member to the People Services Department for referral to a Substance Abuse Professional (SAP). Once referred to an SAP, the Team Member must follow all recommendations of the SAP, and follow-up recommendations of the SAP to remain employed by Watco (exceptions to this rule will be made by Watco on a case-by-case basis). Watco will not pay for these counseling or treatment programs, but will support the Team Member through this process to the extent it can. Only one referral to this Program will be allowed for each Team Member. Additional referrals may be allowed for those in non-safety-sensitive positions, at the sole discretion of Watco.

It is an obligation of all Watco Team Members to refer any other Watco Team Member to a Watco manager if he/she has reason to believe that the Team Member is under the influence of drugs or alcohol, has notified them that they have substance abuse problems, or if any Team Member appears to be working in an unsafe manner. If the Team Member is found to be in violation of the policy, following an investigation, the Team Member may be removed from service. Watco, at their sole discretion, may give the Team Member a one-time referral to a Substance Abuse Professional (SAP) at the Team Member’s own expense. The Team Member must agree to undertake and successfully complete a course of treatment as recommend by the SAP in order to remain employed.

Team members will be given a leave of up to forty-five (45) calendar days to complete a Substance Abuse Program. Leaves beyond 45 days will be at the discretion of Watco.

To the extent state law invalidates some portion of this policy, Watco will continue to enforce the other portions of this policy in those states.