Drug & Alcohol Policy

RELIABLE TRUCKING, INC.
COMMERCIAL DRIVER PROGRAM
I. Purpose Statement

The purpose of Reliable Trucking, Inc.’s Drug & Alcohol Policy is to create, encourage and enforce a safe working environment for all employees and to protect coworkers and the general public from the dangers of substance abuse.

II. Coverage and Implementation

This policy covers all persons employed with Reliable Trucking, Inc. (including subhaulers).

This program shall establish three standards of compliance. The first shall be for those company employees that fall under the Federal Department of Transportation’s ‘Commercial Driver’s License’ driver regulations; those employees shall be henceforth referred to in this document as DOT Drivers. A list of all DOT Drivers shall be maintained at Corporate Headquarters. The second standard shall be for all other ‘field’ employees not covered by the Department of Transportation; those employees shall be henceforth referred to as Non-DOT Employees. The third standard shall be for all drivers contracted as Subhaulers to Reliable Trucking, Inc.. Regulations within this policy shall be intended for all employees and subhaulers unless a section is specifically addressed to one of the mentioned sub-groups.

All management aspects of this program will be handled by the Reliable Trucking, Inc. Safety Department.

III. Scope of Testing

Non-DOT Employees: Testing shall occur in four instances: Pre-Employment, Post-Accident, Reasonable Suspicion and Return to Work. All tests will screen for illegal drugs (which are outlined in section VI: Substances to be Screened) and in instances of Reasonable Suspicion an alcohol test may be conducted.

DOT Drivers: Testing will occur in five instances: Pre-Employment, Post-Accident, Reasonable Suspicion, Return to Work and Random Testing. These tests will screen for illegal drugs and/or alcohol (which are outlined in section VI: Substances to be Screened).
Subhaulers: Random Testing shall be the minimum testing requirement for subhaulers. These tests will screen for illegal drugs and/or alcohol (which are outlined in section VI: Substances to be Screened). Subhaulers will be required to show proof of enrollment in a DOT approved Random Drug Testing Pool (see Section VI. Collection Facility Procedures, subsection d. Random Testing for more information).

IV. Alcohol Policy

The consumption, purchase, sale or use of alcohol by any employee or subhauler during work hours or on any project or work site is **STRICTLY PROHIBITED**. Alcohol abuse is serious and contributes to accidents and life threatening conditions/accidents. If you have an alcohol abuse problem, contact your supervisor or the Drug and Alcohol Program Administrator. Assistance in locating an appropriate treatment center shall be provided. Any employee who voluntarily seeks treatment for an alcohol abuse problem shall not be discriminated against. (Treatment centers and programs can be found under section XIII: Voluntary Substance Abuse Program.)

V. Drug Policy

The consumption, purchase, sale or influence of illegal drugs by any employee or subhauler during work hours or on any project or work site is **STRICTLY PROHIBITED**. Illegal drugs are not only against the law, they can contribute to life threatening conditions/accidents. If you have a drug abuse problem, contact your supervisor or the Drug and Alcohol Program Administrator. Assistance in locating an appropriate treatment center shall be provided. Any employee who voluntarily seeks treatment for a drug abuse problem shall not be discriminated against. (Treatment centers and programs can be found under section XIII: Voluntary Substance Abuse Program.)

The Department of Transportation and Reliable Trucking do not recognize medical marijuana as a legitimate excuse for a positive drug test!!!
VI. Substances to be Screened

<table>
<thead>
<tr>
<th>General Substances</th>
<th>Specific Substances</th>
<th>Non-DOT Conformation</th>
<th>DOT Driver Conformation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amphetamines:</td>
<td>Amphetamine</td>
<td>500 ng/ml</td>
<td>500 ng/ml</td>
</tr>
<tr>
<td></td>
<td>Methamphetamine</td>
<td>500 ng/ml</td>
<td>500 ng/ml</td>
</tr>
<tr>
<td>Cocaine Metabolites</td>
<td></td>
<td>150 ng/ml</td>
<td>150 ng/ml</td>
</tr>
<tr>
<td>Opiates</td>
<td>Morphine</td>
<td>300 ng/ml</td>
<td>2000 ng/ml</td>
</tr>
<tr>
<td></td>
<td>Codeine</td>
<td>300 ng/ml</td>
<td>2000 ng/ml</td>
</tr>
<tr>
<td>Phencyclidine (PCP)</td>
<td></td>
<td>25 ng/ml</td>
<td>25 ng/ml</td>
</tr>
<tr>
<td>Marijuana Metabolites</td>
<td></td>
<td>15 ng/ml</td>
<td>15 ng/ml</td>
</tr>
<tr>
<td>Ethyl Alcohol (when applicable)</td>
<td></td>
<td>0.00 g %</td>
<td>0.00 g %</td>
</tr>
</tbody>
</table>

VII. Collection Facility Procedures

a. Pre-Employment Testing Procedure
(Company Employees Only)
Prospective employees shall be issued a clinic passport by the hiring supervisor and directed to a collection facility before beginning employment with Reliable Trucking, Inc. Prospective employees are required to report directly to the collection facility without delay. Failure to do so will be seen as an admission of guilt and will result in termination of employment.

b. Reasonable Suspicion Testing Procedure
(Company Employees Only)
An employee may be required to submit to a drug and alcohol test if there is reasonable suspicion that the employee is under the influence of drugs and/or alcohol. The employee’s supervisor shall immediately notify the Program Administrator if suspicious behavior is observed. A Safety Department representative, trained in recognizing symptoms of drug and alcohol abuse, shall be dispatched to observe and document the alleged suspicious behavior. The trained representative shall make the determination if a drug and/or alcohol test is necessary. Reasonable causes include (but are not limited to):
(a) Incoherent, slurred speech
(b) Odor of alcohol on the breath
(c) Staggering gait, disorientation, or loss of balance
(d) Red and watery eyes, if not explained by environmental causes
(e) Paranoid or bizarre behavior
(f) Unexplained drowsiness

It is the responsibility of an employee to notify a supervisor if they are taking a legal prescription medication that could result in side effects such as those listed above. A letter from a physician detailing work restrictions must be submitted to the supervisor of any employee that is taking a doctor’s prescribed medicine that could impair the employee’s physical and mental condition.

c. Post Accident Testing Procedure

(Company Employees Only)

Any employee that is involved in an accident caused by that employee’s negligence, carelessness, inattention to proper safety protocols or unsafe conduct resulting in preventable property damage or bodily injury will be required to submit to a drug and/or alcohol test. The test shall be administered immediately following the incident/accident. Should the employee be unable to take the test immediately, the test must be conducted within thirty-two hours of the incident.

d. Random Testing Procedure

DOT Drivers: As mandated by the Department of Transportation (Title 49: Transportation Part 40), all DOT Drivers shall be enrolled in a random drug testing pool which is administered by a neutral third party. On a quarterly basis, the Program Administrator will receive a randomly selected list detailing the employees that must submit to a drug and/or alcohol test. Employees shall be asked to report to a collection facility by their supervisor/dispatcher at a convenient time. The employee must report to the collection facility within 2 hours of notification. Failure to report to a collection facility within 2 hours of notification will be recognized as a positive result with the employee subject to all DOT ramifications and company disciplinary procedures, up to and including termination. All random tests must be completed within the three month time allowance. Employees may be selected more than once for random testing.
**Subhaulers**: As mandated by the Department of Transportation (Title 49: Transportation Part 40), all Subhaulers shall be enrolled in a random drug testing pool which is administered by a neutral third party. Proof of enrollment and compliance with this regulation must be submitted to the Program Administrator on a quarterly basis. Non-compliance with this DOT regulation will result in the termination of your contract with Reliable Trucking. Subhaulers will not be included in Reliable Trucking’s DOT Drivers pool.

**e. Return to Duty**

*(Company Employees Only)*

Any employee who has missed work due to enrollment in the Voluntary Substance Abuse Program (Section XIII) must pass a drug and alcohol test before they are allowed back to work. If the test results are positive, then the employee will be terminated.

**VIII. Collection of Specimen**

At the collection facility, a laboratory technician shall give the employee directions on urine sample collections. For monitored collections, a technician shall watch the collection of the urine specimen (see Section XIV. Consequences of Refusing to Test and Altered Samples for instances where a monitored collection is required). At this time, the employee shall disclose any medication (prescription or non-prescription) currently being used that may alter the test results.

**IX. Testing Process**

**Non-DOT Employees**: Reliable Trucking shall require that a ‘rapid’ test be performed. This test will give a negative or non-negative test result within a half an hour of the test being performed at the collection site. The outcome of the test will be relayed to Reliable Trucking by a laboratory technician once the results have been determined.

Non-negative test results shall be sent out for further laboratory analysis. Upon completion of the laboratory analysis, a Medical Review Officer (MRO) will contact the employee to discuss the results. After telephone contact, or attempted telephone contact, is made with the employee, the MRO shall notify Reliable Trucking of the confirmed test result.
A worker whose condition of employment is dependent on a negative test result shall not be able to return to work until a negative test is confirmed.

**DOT Drivers:** The Department of Transportation mandates that the collection facility sends all urine samples to a certified testing laboratory (‘rapid’ tests will not be accepted). There the sample will be tested in accordance with the Department of Transportation’s Title 49 Part 40 (Procedures for Transportation Workplace Drug and Alcohol Testing Programs). A Medical Review Officer (MRO) working for the certified laboratory will inform both the employee and the Reliable Trucking, Inc. of the test results.

**Subhaulers:** The Department of Transportation mandates that the collection facility sends all urine samples to a certified testing laboratory (‘rapid’ tests will not be accepted). There the sample will be tested in accordance with the Department of Transportation’s Title 49 Part 40 (Procedures for Transportation Workplace Drug and Alcohol Testing Programs). A Medical Review Officer (MRO) working for the certified laboratory will inform the driver of the test results. The driver must then submit these results to the Program Administrator. Failure to do so will result in contract termination.

**X. Employees Right to Re-Test**

*(Company Employees Only)*

Any employee who feels that the results of a drug test are inaccurate may choose to have the original sample re-tested. This does not mean that the employee may provide a new sample. Instead, the original sample will be thawed and tested by a different certified laboratory. The re-test shall be completed at the employee’s expense. If the re-test is negative then Reliable Trucking shall reimburse the employee for cost of the test. Re-testing costs will not be reimbursed for positive re-test results.

**XI. Disciplinary Action**

Employees with a Positive test result shall be immediately removed from any safety-sensitive duties and shall be subject to immediate termination. The Department Head reserves the right to offer company employees with a positive result the option of enrolling in a Voluntary Substance
Abuse Program. While completing this program, the company employee shall not be allowed to perform any safety-sensitive functions. (See section XIII. Voluntary Substance Abuse Program for more program details.)

Any person with a Positive pre-employment test shall not be eligible to enroll in the Reliable Trucking, Inc. Substance Abuse Program.

Subhaulers: Subhaulers are required to immediately inform Reliable Trucking management of any positive drug/alcohol test results. Subhaulers shall have their subcontracts revoked until a Substance Abuse Professional (SAP) releases that subhaulers back to driving duties. A copy of the signed release must be given to the Program Administrator.

XIII. Voluntary Substance Abuse Program

(Company Employees Only)

Non-DOT Employee: If a post-accident, reasonable suspicion or return to work drug and alcohol test is positive, the employee may be given the opportunity to voluntarily enroll in a SAP (Substance Abuse Program). If offered, this voluntary program is the only way for an employee to retain a position after a positive test. A return to work agreement must be established with the Department Head before the employee may be reinstated to their original position with no dock in pay or benefits. The employee shall be asked to submit to a return to work drug and/or alcohol test at a time selected by the Department Head.

All program costs will be the employee’s responsibility. Assistance is available to those employees who qualify. For more information on assistance, contact the Program Administrator.

DOT Drivers: If a post-accident, random, reasonable suspicion or return to work drug and alcohol test is positive, the employee may be given the opportunity to voluntarily enroll in a SAP program (at the option of the company). Enrollment in this voluntary program is the only way for an employee to retain a position after a positive test. For the duration of the program the employee will be placed on unpaid Medical Leave. A return to work agreement must be established with the Department Head before the employee may be reinstated to their original position with no dock in pay or benefits. The employee shall be asked to submit to a return to work drug and/or alcohol test at a random time selected by the Department Head.
All program costs will be the employee’s responsibility. Assistance is available to those employees who qualify. For more information on assistance, contact the Program Administrator.

While enrolled, the employee will be assigned to a Substance Abuse Professional who will evaluate the employee’s specific substance abuse program and who will create a specific counseling program to fit the employee’s needs. The SAP will also work with the Safety Department keeping the Drug and Alcohol Program Administrator advised of when the employee has completed the program and is able to return to work.

XIV. Consequences of Refusing to Test and Altered Samples

(Company Employees Only)

If a company employee refuses to test, leaves a collection facility without submitting a specimen, or if a sample is diluted or altered in any way; it will be treated as a positive test. Refusal to test includes (but is not limited to): Failure to appear at test-site, failure to remain until test is completed, failure to provide a urine sample, failure to permit monitored collection (should it be required), and failure to cooperate with any part of the testing process.

Non-DOT Employees: If any of the above conditions exist, it will be viewed as a positive test result and appropriate disciplinary action will be taken.

DOT Drivers: In accordance with the Department of Transportation Regulations, employees whose samples have been diluted or altered in any way will be required to submit to a second test. This test will be administered as soon as possible and with no prior warning; the second test may be a monitored collection. Unless the employee has a documented medical condition or is taking medication that would dilute or otherwise alter their urine specimen in any way, the employee will be terminated should their second test result in another diluted test.

XV. Employee and Subhauler Responsibilities

It is the employee and subhauler’s responsibility to read, understand and comply with all rules and regulations set forth in this program. Should the employee or subhauler have any questions
on the rules and regulations set forth in this document, it is their responsibility to ask for clarification from the Program Administrator.

XVI. Program Contact Information

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<tr>
<th>Reliable Trucking, Inc. Safety Department</th>
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<tbody>
<tr>
<td>5141 Commercial Circle</td>
</tr>
<tr>
<td>Concord, CA  94520</td>
</tr>
<tr>
<td>Phone (925)685-6799</td>
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<tr>
<td>Fax (925)685-6851</td>
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<tr>
<td>email: <a href="mailto:gbeck@theconcocompanies.com">gbeck@theconcocompanies.com</a></td>
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<tr>
<td>Program Administrator - Graham Beck (925)681-6664</td>
</tr>
<tr>
<td>Department Head - Eric Skow (925)685-6799</td>
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