

Non-Safety Sensitive Duties Alcohol and Drug Free Workplace Policy

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Purpose and Goal

Lufthansa Technik Puerto Rico, LLC (LTPR) is committed to protecting the safety, health and wellbeing of all employees and other individuals in our workplace. We recognize that alcohol abuse and drug use pose a significant threat to our goals. We have established a drug-free workplace program that balances our respect for individuals with the need to maintain an alcohol and drug-free environment.

The manufacture, distribution, sale, dispatch, import, possession, transportation, purchase or illegal use of a drug or controlled substance by an employee is prohibited whether it occurs in or outside the Company's property, in or outside the workplace or in or outside work hours. It is also prohibited to be under the influence of drugs or controlled substances, whether it occurs in or outside the Company's property, in or outside the workplace, or in or outside work hours.

This organization encourages employees to voluntarily seek help with drug and alcohol problems.

LTPR complies with the drug and alcohol testing regulations of the US Department of Transportation (DOT) (49 CFR part 40) and the Federal Aviation Administration (FAA) (14 CFR part 120) and with the Law 59 of August 8, 1997 of Puerto Rico, to regulate the detection of controlled substances in the private labor sector, through the establishment by the employer, of testing programs to detect the use of controlled substances.

Covered Workers - Any individual who conducts business for the organization, is applying for a position or is conducting business on the organization's property is covered by our drug-free workplace policy. Our policy includes, but is not limited to CEO, executive management, managers, supervisors, full-time employees, part-time employees, off-site employees, contractors, volunteers, interns and applicants.

Applicability - Our drug-free workplace policy is intended to apply whenever anyone is representing or conducting business for the organization. Therefore, this policy applies during all working hours, whenever conducting business or representing the organization, while on call, paid standby, while on organization property and at company-sponsored events.

Prohibited Behavior - It is a violation of our drug-free workplace policy to use, possess, sell, trade, and/or offer for sale alcohol, illegal drugs or intoxicants.

Notification of Convictions - Any employee who is convicted of a criminal drug violation in the workplace must notify the organization in writing within five calendar days of the conviction. The organization will take appropriate action within 30 days of notification. Federal contracting agencies will be notified when appropriate.

Searches - Entering the organization's property constitutes consent to searches and inspections. If an individual is suspected of violating the drug-free workplace policy, he or she

may be asked to submit to a search or inspection at any time. Searches can be conducted of lockers, desks and work stations and vehicles and equipment.

Drug and Alcohol Rules

The following rules are extremely important and an employee who violates any one of them will be subject to disciplinary action, up to and including termination.

Alcohol An employee may not possess, use, transfer, offer, or be under the influence of any intoxicating liquor while at work or on company business. This rule prohibits using any alcohol prior to reporting to work, during breaks or meal periods, or in conjunction with any Company activity, except social or business events where a Corporate Officer has authorized the moderate consumption of alcoholic beverages.

An employee will be removed from their position for 24 hours if his/her Breath Alcohol is more than .02 and less than .04. A Breath Test over .04 is a violation, and a referral will be required to an Employee Assistance Program (EAP) before being released back to their position.

Drugs An Employee may not possess, use, transfer, offer, share, attempt to sell or obtain, manufacture, or be under the influence of any drug or similar substance and also may not have any drugs of similar substances present in the body. Thus, an employee who tests positive for any illegal-drug violates this rule. This rule also pertains to prescription drugs being taken without doctors' authorization.

Drug Paraphernalia and Alcohol Containers An employee may not possess any Drug Paraphernalia or Alcohol Containers.

Prescriptions/Over-the-Counter Medications It is the employees responsibility to check the potential effects of prescribed drugs and over-the-counter medications with their doctor or pharmacists before starting work, and to immediately let their supervisor know when such use makes it unsafe for them to report to work or do their job.

Adulterants Any substance that is used for the purpose of manipulating a drug test by adding to the specimen or ingesting.

The possession and / or use of "synthetic urine", masking agents and the possession and use of any other substances to alter and manipulate drugs tests results is strictly prohibited in LTPR and its premises, including the parking lot, security checkpoint and all areas inside the Company. **Any employee who engages in this type of conduct will be terminated.**

LTPR reserves the right to search Company's property to ensure compliance with above mentioned guidelines.

To ensure the accuracy and fairness of our testing program, all testing will be conducted according to Substance Abuse and Mental Health Services Administration (SAMHSA) guidelines where applicable and will include a screening test; a confirmation test; the opportunity for a split sample; review by a Medical Review Officer, including the opportunity for employees who test positive to provide a legitimate medical explanation, such as a physician's prescription, for the positive result; and a documented chain of custody.

All drug-testing information will be maintained in separate confidential records. Each employee, as a condition of employment, will be required to participate in pre-employment, random, post-accident, reasonable suspicion, return-to-duty and follow-up testing upon selection or request of management.

The substances that will be tested for are: Amphetamines, Cannabinoids (THC), Cocaine, Opiates and Phencyclidine (PCP).

Testing for the presence of the metabolites of drugs will be conducted by the analysis of urine.

Any employee who tests positive will be immediately removed from duty, referred to a Substance Abuse Professional (SAP) for assessment and recommendations, required to successfully complete recommended rehabilitation including continuing care, required to pass a Return-to-Duty test and sign a Return-to-Work Agreement, subject to ongoing, unannounced, follow-up testing for a period of five years and terminated immediately if he/she tests positive a second time, refuse to be tested for drugs and/or alcohol, or violates the follow-up testing.

An employee will be subject to the same consequences of a positive test if he/she refuses the screening or the test, adulterates or dilutes the specimen, substitutes the specimen with that from another person or sends an imposter or refuses to cooperate in the testing process in such a way that prevents completion of the test.

Consequences

One of the goals of our drug-free workplace program is to encourage employees to voluntarily seek help with alcohol and/or drug problems. If, however, an individual violates the policy, the consequences are serious.

In the case of applicants, if he or she violates the drug-free workplace policy, the offer of employment can be withdrawn. The applicant may not reapply.

If an employee violates the policy, he or she will be subject to progressive disciplinary action and may be required to enter rehabilitation. **An employee required to enter rehabilitation that fails to successfully complete the program and/or repeatedly violates the policy will be terminated from employment.** Nothing in this policy prohibits the employee from being disciplined or discharged for other violations and/or performance problems.

Return-to-Work Agreements

Following a violation of the drug-free workplace policy, an employee may be offered an opportunity to participate in rehabilitation. In such cases, the employee must sign and abide by the terms set forth in a Return-to-Work Agreement as a condition of continued employment.

Assistance

Lufthansa Technik Puerto Rico recognizes that alcohol and drug abuse and addiction are treatable illnesses. We also realize that early intervention and support improve the success of rehabilitation. To support our employees, our drug-free workplace policy:

- Encourages employees to seek help if they are concerned that they or their family members may have a drug and/or alcohol problem.

- Encourages employees to utilize the services of qualified professionals in the community to assess the seriousness of suspected drug or alcohol problems and identify appropriate sources of help.
- Ensures the availability of a current list of qualified community professionals.

Treatment for alcoholism and/or other drug use disorders may be covered by the employee benefit plan. However, the ultimate financial responsibility for recommended treatment belongs to the employee.

Absences of an employee to attend a rehabilitation program with the SAP can be charged first to sick leave and then to vacation leave. After exhausting the days of leave with pay, the employee shall be entitled to a leave without pay for a maximum of thirty (30) days while attending a rehabilitation program.

Confidentiality

All information received by the organization through the drug-free workplace program is confidential communication. Access to this information is limited to those who have a legitimate need to know in compliance with relevant laws and management policies.

Shared Responsibility

A safe and productive drug-free workplace is achieved through cooperation and shared responsibility. Both employees and management have important roles to play.

All employees are required to not report to work or be subject to duty while their ability to perform job duties is impaired due to on- or off-duty use of alcohol or other drugs.

In addition, employees are encouraged to:

- Be concerned about working in a safe environment.
- Support fellow workers in seeking help.
- Use the Employee Assistance Program.
- Report dangerous behavior to their supervisor.

It is the supervisor's responsibility to:

- Inform employees of the drug-free workplace policy.
- Observe employee performance.
- Investigate reports of dangerous practices.
- Document negative changes and problems in performance.
- Counsel employees as to expected performance improvement.
- Refer employees to the Human Resources Department
- Clearly state consequences of policy violations.

Communication

Communicating our drug-free workplace policy to both supervisors and employees is critical to our success. To ensure all employees are aware of their role in supporting our drug-free workplace program:

- All employees will receive a written copy of the policy.
- The policy will be reviewed in orientation sessions with new employees.
- The policy and assistance programs will be reviewed at safety meetings.
- All employees will receive an update of the policy annually with their paychecks.
- Posters and brochures will be available at all locations.
- Employee education about the dangers of alcohol and drug use and the availability of help will be provided to all employees.

Every supervisor will receive training to help him/her recognize and manage employees with alcohol and other drug problems.

Every employee will receive training of Drug-Free Workplace concerning the effects of alcohol misuse and controlled substances abuse on an individual's health, workplace, and personal life as well as the signs and symptoms of an alcohol or controlled substances problem.

Recreational and Medical Marijuana:

Although some states have passed laws that permit the recreational or medical use of marijuana, the Medical Review Officer (MRO) who reviews your test results will not verify your drug test as negative based on that use.

Medical Cannabis:

- LTPR prohibits medical cannabis use in the workplace, including medication, possession, purchase or sale of medical cannabis or being under the influence of medical cannabis, any product containing medical cannabis or any derivative of medical cannabis, during work hours, while in company premises, or when representing the company in any capacity, even when the employee is a qualified certified patient.
- The employee shall be responsible for his/her acts and/or omissions and any harm caused to third parties or to the property of third parties while under the influence of medical cannabis, any product containing medical cannabis or any derivative of medical cannabis, during work hours, while in company premises, or in any event where the employee is representing the company. **Any employee under the influence of “medical marijuana or cannabis” will be removed from performing his/her duties and cannot return to work until the employee has been evaluated by a Substance Abuse Professional (SAP).** The employee is responsible for all arrangements for the SAP evaluation, including all associated costs for education and treatment. The employee will have 48 hours to coordinate an appointment with a SAP and must provide evidence to the employer.

LTPR employees will be subject to unannounced drugs testing at any moment, including days off from work. The employee will be compensated for that time.

LTPR employees who are on an extended duty travel are subject to drugs testing upon returning to work.

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Lufthansa Technik Puerto Rico, LLC

NON-SAFETY SENSITIVE DUTIES

ALCOHOL AND DRUG FREE WORKPLACE POLICY-INFORMATION SHEET

Company DFW Program Administrator: Carmen Sud

Company Location:

Lufthansa Technik Puerto Rico, LLC
San Antonio Road
Aguadilla, PR 00604
(787) 230-7708

Testing Laboratory:

Quest Diagnostics
800-877-7484

Collection Site:

Laboratorio Clínico Irizarry Guasch
Carretera 107 Km. 3.7 Bo. Borinquen
Borinquen Town Plaza
Aguadilla, PR 00603
Teléfono: 787-891-8899
Fax: 787-891-8666
E-mail: lig.aguadilla2@gmail.com

Medical Review Officer (MRO):

Paul Teynor, MD
WorkforceQA
1430 S Main St
Salt Lake City, UT 84115
Ph: 801-503-3493
Fax: 385-549-8700

Employee Assistance Program (EAP) Referral, you can contact your Health Insurance Provider for a list of treatment programs in your area, as applicable.

NATIONAL HOTLINE NUMBERS

Alcohol and Drug Referral Hot Line 1-800-252-6465
Child Help's - National Child Abuse Hot Line 1-800-422-4453
National A.I.D.S. Hot Line 1-800-342-2437
National Cocaine Hot Line 1-800-262-2463
National Hepatitis Hot Line 1-800-223-0179
National Runaway Switchboard and Suicide Hot Line 1-800-621-4000
National Sexually Transmitted Disease Hot Line 1-800-227-8922

NATIONAL ASSISTANCE GROUPS

Alcohol Anonymous 1-800-344-2666
M.A.D.D 1-800-438-6233
Narcotics Anonymous 1-818-780-3951
AL-ANONE Family Group Headquarters 1-800-356-9996
Nat'l Institute of Drug Abuse, Drug Info. Treatment 1-800-662-4357
Families Anonymous 1-700-736-9805
S.A.D.D. 1-508-481-3568
Tough Love 1-800-333-1069
Center for Substance Abuse Prevention 1-800-662-4357