



PACKAGING CORPORATION OF AMERICA

## PACKAGING CORPORATION OF AMERICA CONTRACTOR DRUG SCREENING MINNESOTA STATE MILL LOCATION ONLY

### Purpose

PCA, on behalf of itself and its subsidiaries (collectively, “PCA” or “Company”) is committed to providing a safe work environment. Screening for drugs is a means by which to prevent impairment on the job site.

### Scope

This program applies to all on-site contractors and subcontractors (each a “Contractor”) and their personnel present at PCA’s International Falls, MN facility and is required during all major outages as identified on the *PCA Corporate Major Outage Schedule*. This program may also be applied during other outages and capital projects as designated by location management.

### Policy

PCA will conduct random drug screening of on-site Contractor personnel. PCA will conduct drug testing in a manner that complies with federal, state, and local laws under the following circumstances:

- **Random Testing** – PCA may request or require Contractor personnel performing safety-sensitive work to undergo drug testing on a random selection basis.
- **Reasonable Suspicion Testing** – PCA may request or require Contractor personnel to undergo drug testing if PCA has reasonable suspicion that the Contractor personnel:
  - is under the influence of illegal drugs; or
  - has violated the Company’s written work rules prohibiting the use, possession, sale, or transfer of drugs (including the Company’s Contractor Drug & Alcohol Random Screening Policy, Company’s Safe Practices for Outside Contractors Policy, and the applicable contractual agreement between Company and Contractor’s employer) while the Contractor personnel is working or while the Contractor personnel is on PCA’s premises or operating PCA’s vehicle, machinery, or equipment.
- **Post-Accident Testing** – PCA may request or require Contractor personnel to undergo drug testing if PCA has reasonable suspicion that the Contractor personnel:
  - has sustained a personal injury or has caused another Contractor or individual to sustain a personal injury; or
  - has caused a work-related accident or was operating or helping to operate machinery, equipment, or vehicles involved in a work-related accident.

Pursuant to the applicable contractual agreement between Company and Contractor, a Contractor shall not permit entry, and shall promptly remove from PCA property, any of the Contractor’s personnel who have a non-negative result for illegal drugs on a test or otherwise violate the terms of this Policy or the Contractor’s Drug & Alcohol Policy, the Company’s Safe Practices for Outside Contractors Policy, or the applicable contractual agreement between Company and Contractor. Subject to the exception listed below, the individual removed shall be prohibited from working on any PCA project for a period of one (1) year from date of violation. Any further action regarding Contractor personnel who violate this Policy is at the sole discretion of Contractor and each Contractor shall comply with all applicable local, state and federal laws with respect to any actions involving Contractor personnel and the implementation of this Policy. The following results/actions will be treated as a violation pursuant to this policy: positive confirmatory test result from a certified drug testing laboratory, adulterated samples or results, refusal to test (screening or confirmatory).

An individual who violates this policy shall be permitted to work on a PCA project before the one year ban expires if the individual, in conjunction and through the individual’s employer, participates in a drug counseling or rehabilitation program, whichever is more appropriate, as determined by the individual’s employer after consultation with a certified chemical use counselor or a physician trained in the diagnosis and treatment of substance use disorder. In order for the foregoing to apply, the individual’s employer must provide PCA written confirmation that the individual has completed an appropriate



program. If such verification is not provided or the individual fails to successfully complete the program, the individual shall be prohibited from working on any PCA project for a period of one (1) year from the date of such failure.

#### **Random Selection Process & Notification**

On each shift designated for screening, the random selection will be run from a master pool of all Contractor personnel currently on-site.

Each Contractor must provide a designee for random drug screening coordination (along with their contact information) to Mill EHS prior to arrival. That designee will be notified of selected screening contractor personnel participants. It is the Contractor designee's responsibility to notify their own personnel to report for screening and provide them all information to complete screening.

#### **Contractor Company & Personnel Responsibility**

Screening will be provided at time and location to be announced by PCA site management. Individuals selected for testing must report to the screening location during the indicated screening times.

If any individual is not able to complete the drug testing within the designated time, they will be required to leave the mill property. If alternative arrangements are needed, it is the Contractor designee's responsibility to contact Mill EHS as soon as possible. Any delays or increases in cost related to Contractor's work and/or services for PCA as a result of the removal of Contractor personnel due to a non-negative test or failure to complete testing shall be borne solely by the Contractor and no extensions to Contractor's time to complete its work or services to PCA shall be granted.

#### **Testing Procedures**

Before requesting Contractor personnel to undergo drug testing, PCA will provide the Contractor personnel participant with a form on which to acknowledge that the Contractor personnel participant has seen this Policy.

A Contractor personnel participant has the right to refuse to undergo drug testing required under this Policy. A Contractor personnel participant who refuses to consent to testing will be immediately removed from PCA's property and shall be prohibited from working on any PCA property for a period of one year (it shall be Contractor's responsibility to remove the individual from PCA's property).

A Contractor personnel participant who undergoes a drug test under this Policy has the right to explain a positive result on a confirmatory test and to request and pay for a confirmatory re-test of the original sample.

#### **Screening & Results**

The screening device used will be an oral fluid device that allows a specimen to be collected on-site and then sent to a certified laboratory (Clinical Reference Laboratory) for testing, along with a chain of custody form.

Each Contractor personnel will be asked to provide photo ID and sign a consent agreement for screening (see Appendix A). Participating Contractor personnel should not eat or drink for 10 minutes prior to screening and will be asked to wait if needed.

The PCA location must retain a copy of all non-negative results or refusals for a period of six years. All consent forms shall be retained for a period of six years. Each Contractor personnel participant will receive a copy of their result in compliance with applicable law and a copy of the results will be provided to the participant's employer.

Participants will be allowed to return to work, pending test results, which may take up to several days. Participants will be notified of their results in writing not more than 3 working days from receipt of result.

#### **Prescription Drugs**

It is an individual worker's responsibility and obligation to determine, in consultation with their licensed healthcare provider, whether a legal drug they are taking may or will affect their ability to perform their job duties safely and efficiently. An individual taking legal drug(s) whose impairment may affect job safety and/or performance must notify their designated supervisor for further instruction.



For an individual who is lawfully taking prescription medications as directed by their licensed healthcare professional; all certified lab test results are verified by a Medical Review Officer (MRO) – a licensed Physician who is additionally trained & certified in substance testing. The Medical Review Officer will contact the donor of any positive sample to discuss the results. If the Medical Review Officer determines there is a legitimate medical explanation for a lab-confirmed positive test result, they may report the final result to PCA as negative. However, the Medical Review Officer may note on the results that there is a safety concern. All workers should be aware that they are not permitted to work while under the influence of prescription medications that affect the safe work environment.

### No other Appeal Procedures

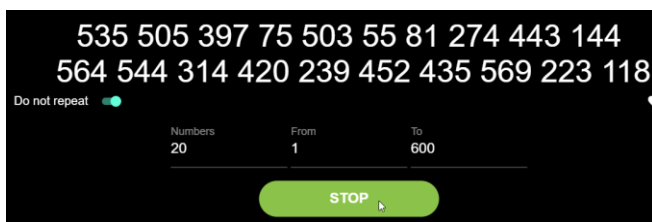
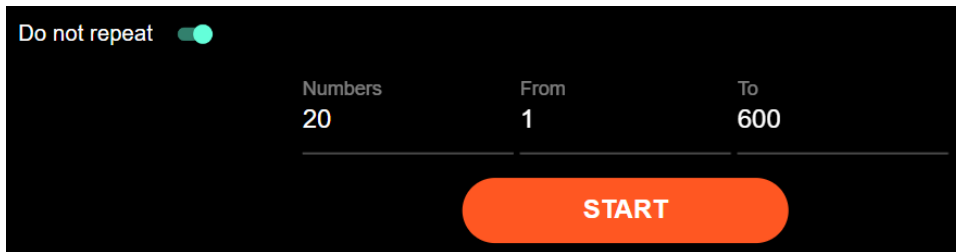
Except as otherwise stated in this Policy, no other appeal procedures are available.

### For PCA personnel only:

Once a numbered, master list of contractor personnel currently on-site has been generated, follow the steps below for random selection.

Using [Random Number Generator](#) (Ctrl+Click to open link):

1. Toggle the “Do not repeat” switch to **ON** (will display in green).
2. For the field “Numbers” enter the number **of tests required for the current test session**.
3. For the field “From” always enter the number “1”
4. For the field “To” always enter the **total number of contractors currently** on site, based on the master list.
5. Once all fields entered, select “Start”
6. The names on the master list that correspond to the numbers generated, are the randomly selected contractors to be screened.
7. New master lists and random numbers should be generated each day/shift.





## Appendix A

### ACKNOWLEDGMENT OF RECEIPT OF POLICY AND CONSENT TO TESTING

I certify that I received, reviewed, and understand Packaging Corporation of America’s Contractor Drug Screening Policy for MINNESOTA Mill Location, and any applicable State Supplement(s) (the “Policy”). I agree to comply with the Policy and understand that failure to comply is grounds for immediate removal from PCA.

I consent to submit to drug testing as requested or required by Packaging Corporation of America and as outlined in the Policy. I consent to provide the requested specimen at the assigned collection site and certify that specimen is my own and has not been substituted or adulterated. I consent to the release of the drug screen results on tests requested or required by Packaging Corporation of America and as outlined in the Policy, including disclosure of the results to my employer.

Contractor Personnel Name:		Date:	
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Contractor Personnel Signature:	
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Contractor Company Name:	
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**PCA will inform you in writing of your test result. Please provide your preferred contact information for this purpose below.**

**Check the box for your preference and please write legibly**

<input type="checkbox"/>	Email Address (preferred):	
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OR

<input type="checkbox"/>	Mailing Address:	

*PCA Personnel: Retain this document for a period of six years*



## Appendix B

### REFUSAL TO CONSENT/COMPLY

Upon refusal to consent/comply to random drug screening conducted or coordinated by Packaging Corporation of America, the Contractor Company Designee must be notified to immediately remove the individual from PCA property for a period of one (1) year from the date of this refusal. Refusal includes, pursuant to PCA's Contractor Drug Screening Policy for MINNESOTA Mill Location:

- Refusal to submit to random drug testing
- Causing any undue delay in submitting to a drug test
- Tampering with or attempting to tamper with the drug testing process including adulteration of specimen

I certify that I have received, reviewed, and understand Packaging Corporation of America's Contractor Drug Screening Policy, and any applicable State Supplement(s) (the "Policy"). I hereby refuse to comply with the Policy and understand that failure to comply is grounds for immediate removal from PCA property for a period of one (1) year from this refusal. I consent to PCA sharing this document with my employer.

Contractor Personnel Name:		Date:	
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Contractor Personnel Signature:	
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Contractor Company Name:	
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*PCA Personnel: Retain this document for a period of six years.*

*PCA Personnel: If an individual refuses to sign this Refusal to Consent/Comply, document the refusal by noting the Contractor Personnel's Name, the date, the name of the PCA personnel involved, and signature of the PCA personnel involved.*