



PACKAGING CORPORATION OF AMERICA

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### CONTRACTOR DRUG & ALCOHOL RANDOM SCREENING PROGRAM

#### (MILL LOCATIONS ONLY)

#### Purpose

PCA, on behalf of itself and its subsidiaries (collectively, “PCA” or “Company”) is committed to providing a safe work environment for employees, contractors and their personnel. The Company’s drug & alcohol program, which includes random screening, is a means by which to prevent impairment on the job site.

#### Scope

This program applies at all PCA Mills and to all on-site contractors and subcontractors (each a “contractor”) and their personnel (“Contractor personnel”) performing work during a Major Outage as identified on the *PCA Corporate Major Outage Schedule*. This program may also apply during other outages and capital projects as designated by location management.

#### Policy

PCA will perform drug & alcohol testing (hereinafter “Testing”) if/when reasonable suspicion exists, or in the event of any industrial-related incident that causes property damage or injury, where there is reason to believe that impairment may have caused or contributed to the incident.

- **Reasonable Suspicion** – PCA may require Contractor personnel to undergo Testing if PCA has reasonable suspicion that the Contractor personnel:
  - is under the influence of drugs or alcohol; or
  - has violated the Company’s written work rules prohibiting the use, possession, sale, or transfer of drugs or alcohol 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 require Contractor personnel to undergo Testing if 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.
- PCA may also require Contractor personnel who are performing safety-sensitive work to undergo **Random** screening.

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 Contractors’ personnel who test positive for drugs or alcohol. In the event the policy violation involves alcohol (subject to the limits identified below) or marijuana, the individual removed shall be prohibited from working on any PCA project for a period of twenty-four (24) hours. For violations of all other substances, the individual 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 are non-negative is at the sole discretion of the Contractor. It is PCA’s expectation that Contractors will comply with all applicable local, state and federal laws with respect to application and the implementation of this policy.

For the purposes of this policy, a “non-negative” test is defined to include the following: a non-negative screening without subsequent/confirmatory test, adulterated or attempting to adulterate or tamper with samples or results, causing any undue delay in submitting to a drug and/or alcohol test, or refusal to test (screening or confirmatory).



## **For MN Mill Location Only:**

Any Contractor personnel who violates this policy shall be permitted to work on a PCA project if the individual, in conjunction and through the individual's employer, participates in an approved and accredited rehabilitation program. 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 Screening 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 and alcohol 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 and alcohol testing within the designated time, they will be required to leave the mill property. If alternative arrangements are needed, it is the Contractor Company 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.

Before requesting Contractor personnel to undergo Random screening, PCA will provide the Contractor personnel participant with a form on which to acknowledge that the Contractor personnel participant has received and had an opportunity to review this Policy.

Contractor personnel have the right to refuse to undergo Random screening. A Contractor personnel who refuses to consent to Random screening 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 who undergoes Random screening has the right to an explanation of 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 devices used will be a rapid oral fluid swab test for drugs and QED rapid oral fluid test for alcohol. These typically provide results within 10 minutes. The drug screen is positive or negative for each drug tested. The alcohol screen is a semi-quantitative test that will give an estimated blood alcohol concentration. PCA will require lab-certified subsequent/confirmatory urine testing on all non-negative rapid drug screen results.

Each Contractor personnel selected for Random screening will be asked to provide photo ID and sign a consent agreement for screening (see Appendix A). Individuals selected for Random screening will be advised and will be expected to comply with the requirement that they not eat or drink for ten (10) minutes prior to screening and will be required to wait if needed in order to comply with this requirement. Participants will be notified of their results in writing not more than three (3) working days from receipt of result. Contractor and Contractor personnel selected for screening will be provided with the results of the screening.



**Cutoff Levels for oral fluid rapid screening:**

iSCREEN ORAL FLUID TEST		Cut-Off Levels
Drugs of Abuse	Abbreviation	Cut-off (ng/mL)
Amphetamine	AMP	50
Barbiturates	BAR	50
Buprenorphine	BUP	5
Benzodiazepines	BZO	10
Cocaine	COC	20
Ecstasy	MDMA	50
Methamphetamine	MAMP	50
Methadone	MTD	30
Opiates/Morphine	OPI/MOR	40
Oxycodone	OXY	20
Marijuana	THC	40
<b>QED Alcohol Saliva Test</b>	Alcohol	0.00 – 0.15% BAC

- ❖ Participants with both a negative drug screen result & a negative alcohol screen result (0.00% BAC) will be permitted to return to work.
- ❖ **If the results of the alcohol screen are non-negative (above 0.00% BAC):**
  1. The Contractor Company Designee will be notified immediately.
    - **0.010% BAC – 0.019% BAC:** After Contractor consultation with Mill EHS, an individual *may* be permitted to work in the absence of any sign(s) of impairment.
    - **0.020% BAC – 0.079% BAC:** The individual must be removed from PCA property immediately. The individual will be permitted to return and work after a minimum of 24 hours from positive test and only upon subsequent negative result on follow-up test to be collected at time of re-entry.
    - **0.080% BAC and above:** The individual must be removed from PCA property immediately and prohibited from working on any PCA project for a period of (1) year from violation.
- ❖ **If the iSCREEN rapid drug screen is non-negative for THC only:**
  1. The Contractor Company Designee will be notified immediately.
  2. No confirmatory sample collection is necessary.
  3. The contractor must be removed from the facility/property by the Contractor as soon as possible.
  4. The contractor **may return** after a minimum of 24 hours from positive test and only upon subsequent negative result on follow-up test to be collected at time of re-entry.
- ❖ *Because the window of detection for alcohol and THC (on rapid swab) are typically within the most recent 24 hours, no compensation for lost time due to a positive on either of these will be paid.*
- ❖ **If the results of the iSCREEN rapid drug screen are non-negative for any other substance than THC:**
  1. The Contractor Company Designee will be notified immediately.
  2. Upon participant consent, a subsequent/confirmatory urine sample must be collected/sent to a certified lab (ie Blueline) for testing as soon as possible. Collections will be completed or coordinated by Mill Health Services/EHS.
  3. The contractor personnel must be removed from the facility/property by the Contractor as soon as possible, pending confirmatory test results.
  4. Refusal to submit to confirmatory testing will result in immediate removal and one (1) year ban from PCA. See also Appendix C.



## **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.

Upon non-negative screening result and confirmatory sample collection, the individual may choose to provide valid prescription information to the on-site medical professional (Mill Nurse). At the Nurse's discretion and only in the absence of any additional concerns, the individual *may* be permitted to return to work while the confirmatory results are pending.

## **Subsequent/Confirmatory Testing**

PCA will require lab-certified subsequent/confirmatory urine testing on all non-negative rapid drug screen results. This subsequent/confirmatory testing will be coordinated and paid for by PCA. Results of the subsequent/confirmatory test will be sent to the Contractor's Company Designee. Please be aware that results may take up to several days. It is PCA's intent that an individual and/or Contractor be minimally impacted by this process and therefore, individuals who receive negative subsequent/confirmatory results (without a noted safety concern by the Medical Review Officer) may submit with their Contractor and appropriate PCA agent, the appropriate scheduled work hours to be invoiced for payment while test results were pending, so long as the individual responds to contact from the Medical Review Officer within 24 hours.