



---

# Drug and Alcohol Policy

## POLICY STATEMENT

The manufacturer of paper and corrugated products involves the use of industrial equipment and machinery that can be dangerous. The equipment and machinery has the potential to cause serious personal injury or even death, particularly when operated incorrectly. Within PCA's safety-sensitive work environment, there is no tolerance for impairment caused by the use of drugs or alcohol. An individual who is under the influence of a Prohibited Drug is considered Impaired under this Policy.

## PRE-EMPLOYMENT TESTING

**A negative drug test is a term and condition of employment with PCA. Consequently, an offer of employment is subject to compliance with this Policy. Applicants will need to submit to a drug test. Applicants will not be tested for marijuana. However, use of marijuana in a manner that may cause Impairment in the workplace is strictly prohibited.<sup>1</sup>**

## REQUIREMENTS

The following are prohibited under this Policy:

- Testing positive or receiving a non-negative test result for one or more Prohibited Drugs;<sup>2</sup>
- Reporting to work Impaired;
- Working while Impaired;
- Use of any Prohibited Drug at any time during scheduled work hours;
- Refusal to Test when the Company declares Reasonable Suspicion;
- The sale, purchase, transfer and/or possession of any Prohibited Drug on PCA property; and
- The possession and/or use of any prescription medication for which the employee does not have a current and valid prescription. Prescription medications must be taken or used as prescribed in order to maintain compliance with this Policy.

## MEDICATIONS

If an employee is prescribed a medication that may cause Impairment, he/she must comply with the following procedures:

- Advise the medical provider who has prescribed the medication(s) that he/she works in a safety-sensitive work environment and provide a copy of the job description

- (available from Human Resources) to the medical provider;
- Work with the medical provider to ensure that the use of the prescription medication(s) will not cause Impairment while at work. If this is not feasible, the employee should remain off work on medical leave; and
- Provide a letter to Human Resources from the medical provider confirming that the above steps have been taken to avoid the possibility of Impairment while at work. Use of prescription medication(s) will be documented within the employee's medical file.

## **MARIJUANA**

PCA operates in jurisdictions where use of marijuana is illegal. PCA also operates in jurisdictions where use of medical marijuana and/or recreational marijuana is legal. This policy applies to marijuana irrespective of the law within your particular jurisdiction. Marijuana, including but not limited to THC derivatives (referred to as Cannabinoids), should not be brought onto PCA property or otherwise manufactured, dispensed, possessed or used while performing work for PCA. PCA does not have an interest in an employee's off work conduct so long as the conduct does not interfere with an employee's full compliance with this Policy.

## **REASONABLE SUSPICION**

An employee will be expected to submit to drug and alcohol testing under the following circumstances:

- An employee is suspected of being Impaired at work using objective criteria;
- An employee is involved in a Near Miss incident where there is reason to believe Impairment may have been a contributing factor; or
- An employee is involved in an incident causing personal injury and/or property damage where there is reason to believe Impairment may have been a contributing factor.

The testing will occur within reasonable proximity of the circumstances that precipitated the testing. A threshold test may be used where a violation of policy is suspected; however, a confirmatory test must be used to determine a policy violation.

## **DISCIPLINARY ACTION**

An employee determined to be in violation of this policy is subject to disciplinary action up to and including separation of employment.

## **EMPLOYEE ASSISTANCE PROGRAM (EAP)**

The Company has an EAP. Employees are encouraged to utilize the EAP. An employee's use of the EAP will not be considered for the purposes of any disciplinary action. However, this protection is only afforded to employees who submit to the EAP prior to a violation of Company policy.

## DRUG-FREE WORKPLACE ACT

Recipients of federal contracts must comply with this Act. Through this Policy, PCA is committed to maintaining a drug-free workplace in compliance with the Act. An employee who is convicted of a drug-related offense involving the workplace must report the conviction to the Company within five (5) days.

### DEFINITIONS

- **Impaired/Impairment:** Use or consumption of a Prohibited Drug that may cause adverse impact upon the ability to safely perform job duties and make sound and reasoned decisions while at work.
- **Near Miss:** A safety incident that did not result in injury or property damage but could have easily had the potential to do so.
- **Prohibited Drugs:**

	Threshold Test	Confirmatory Level <sup>3</sup>
Alcohol		.08
Amphetamines	1000 ng/ml	500 ng/ml
Cocaine	300 ng/ml	150 ng/ml
Marijuana (THC)	50 ng/ml	30 ng/ml
Opiates (Including Hydrocodone and Hydromorphone)	2000 ng/ml	2000 ng/ml
Benzodiazepines	300 ng/ml	300 ng/ml
Barbiturates	300 ng/ml	300 ng/ml
Propoxyphene/Methadone	300 ng/ml	300 ng/ml
Phencyclidine (PCP)	25 ng/ml	25 ng/ml
Oxycodone	100 ng/ml	100 ng/ml

- **Refusal to Test:** Includes but is not limited to: i) refusing to take a test, ii) adulterating a test; iii) or otherwise attempting to alter a test result.

### RANDOM TESTING

A PCA location that conducts random testing will adhere to the following protocol:

- An employee roster containing the names of all employees subject to testing will be provided periodically (not less than annually) to the Company's designated third party testing provider;
- The provider will utilize an objective and random process for identifying PCA employees subject to random testing; and
- Under no circumstance may the location modify the list of employees identified by the provider who are subject to testing.

---

<sup>1</sup> Use of medical marijuana as provided for under certain state laws will be considered a Medication under this Policy.

<sup>2</sup> An exception may apply for lawful use of marijuana in states where medical or recreational use is permitted.

<sup>3</sup> Stated test levels are for urine based testing. Test levels will vary based upon the methodology of the drug screen. Comparable industry standard testing levels will be used for oral fluid (saliva) based testing.

Revised August 25, 2023