

**METALCRAFT OF MAYVILLE
PRE-EMPLOYMENT / POST ACCIDENT / REASONABLE SUSPICION DRUG
TESTING POLICY**

PURPOSE:

Metalcraft of Mayville is committed to providing a safe and healthy workplace. The following corporate pre-employment / post accident / reasonable suspicion drug testing policy has been established to facilitate the development of a drug-free work force.

INTRODUCTION & OVERVIEW:

The Metalcraft of Mayville pre-employment / post accident / reasonable suspicion drug testing policy applies to all prospective employees and current employees. All prospective employees must complete a pre-employment drug test. Any employee who seeks medical treatment beyond in house first aid for a work related injury (including any employee who was directly involved with the cause of the accident which resulted in the injury or any property damage) must complete a post accident drug test. Any employee that Metalcraft of Mayville has reason to believe is under the influence of a controlled substance or alcohol will be required to complete a reasonable suspicion drug test.

PROCEDURES & REQUIREMENTS FOR PRE-EMPLOYMENT DRUG TESTING:

Once the potential employee has successfully completed the interview process, the potential employee will be provided with a copy of the Metalcraft of Mayville pre-employment drug testing policy. At that time the policy will be explained to the potential employee.

All offers by Metalcraft of Mayville to hire an applicant for a position are conditioned upon the applicant taking and passing the drug test via hair analysis as directed by Metalcraft of Mayville (or such other test(s) as may be deemed appropriate by the company in certain situations where a hair specimen cannot be provided). The hair analysis will be completed by Psychemedics Corporation utilizing their FDA-approved and patented hair analysis method. The analysis will be for marijuana, cocaine, opiates, amphetamines (including Ecstasy) and PCP. This test is required before any employee applicant will be hired. Any applicant who refuses or fails to submit to a pre-employment drug test as directed will not be considered eligible to work for Metalcraft of Mayville. Any applicant that is unable to provide a hair sample will be asked to reapply when he/she is able to provide a 1-inch hair specimen.

Potential employees will be notified of the results of the drug test after receipt of the results by Metalcraft of Mayville or its MRO. Before an applicant's test result will be confirmed positive for drugs, the applicant will be given the opportunity to speak to Metalcraft of Mayville's MRO and demonstrate that there was a legitimate medical explanation for the positive test result. If the MRO determines a legitimate medical explanation exists, the test will be reported as "negative". If the MRO determines that a

legitimate medical explanation does not exist, the test result will be reported to Metalcraft of Mayville as “confirmed positive”.

A “confirmed positive” result for any drug will establish “use” for purposes of this policy. Any applicant with a confirmed positive result will not be considered eligible to work at Metalcraft of Mayville. Applicants who test positive may reapply after 12 months or after evidence of rehabilitation is provided.

TESTING METHODOLOGY & INTEGRITY:

The testing will be performed in a manner that ensures the integrity and accuracy of each test. All specimen collection, analysis, and laboratory procedures shall be conducted in accordance with established Psychemedics Corporation procedures. This includes, among other things:

- (i) procedures to ensure the correct identity of each employee at the time of testing;
- (ii) a strict chain-of-custody procedure to ensure the integrity of the process;
- (iii) the use of individuals that have been certified to perform hair collections;
- (iv) only the Psychemedics lab will be utilized in performing the hair analysis
- (v) the confirmation of an initial positive drug screen by a second analysis using Gas Chromatography/Mass Spectrometry (GCMS);
- (vi) Metalcraft of Mayville appointment of a qualified Medical Review Officer (MRO) to review the drug test results before they are reported to a Metalcraft of Mayville designated representative.

Hair collection sites will include the scalp, trunk, arms, legs, and axilla. Samples will not be taken from the pubic area.

HANDLING OF TEST RESULTS REPORTED AS INVALID SAMPLE OR QNS

INVALID SAMPLE: Invalid samples are samples that are not processed by the lab due to documentation errors that occur during the sample/specimen collection. In the case of an invalid sample the applicant will be asked to provide another specimen. The MRO will contact the collector to review the collection process with the intent of preventing a second invalid result

QUANTITY NOT SUFFICIENT(QNS): QNS samples are samples received by the lab which do not contain enough hair to complete the testing procedure. In the case of a QNS sample the applicant will be asked to provide another specimen. The MRO will contact the collector to review the collection process with the intent of preventing a second QNS result.

ADDRESSING SITUATIONS WHERE HAIR TEST RESULTS ARE NOT OBTAINABLE

Applicant unable to provide hair specimen:

Applicants unable to provide a hair sample will need to provide documentation from their personal physician identifying the medical condition that has resulted in their inability to grow hair. The documentation will be reviewed by Metalcraft of Mayville's MRO. If a legitimate medical explanation is identified the applicant will be asked to provide a urine

specimen for completion of a urine drug screen. The UDS will be collected, reviewed, and handled according to established protocols that are already in place for Metalcraft of Mayville's drug testing programs that follow DOT guidelines for federally mandated drug testing programs.

Situations developing that are not addressed by this policy will be handled on a case by case basis.

PROCEDURES & REQUIREMENTS FOR POST ACCIDENT DRUG TESTING:

Any employee who seeks medical treatment beyond in house first aid for a work related injury (including any employee who was directly involved with the cause of the accident which resulted in the injury or any property damage) must complete a post accident drug test. Post accident drug screens shall not be done for the following injuries: Repetitive strains such as carpal tunnel; if the employee is injured by the actions of others; injuries like bee stings; or an injury due to a machine malfunction. If the drug test is completed within 96 hours of the date of injury a urine test will be used, and handled according to established protocols that are already in place for Metalcraft of Mayville's drug testing programs that follow DOT guidelines for federally mandated drug testing programs. For any reason the post accident drug test will be completed 96 hours or more after the date of injury a hair analysis test will be used (all terms of the hair test are the same as stated for the pre-employment drug test). If for any reason the post accident urine test results are reported to Metalcraft of Mayville as "dilute", that employee must submit to a follow up drug test via hair analysis (all terms of the hair test are the same as stated for the pre-employment drug test.) If that employee refuses to submit to the hair test, the "dilute" specimen will be presumed as a confirmed positive test result.

A "confirmed positive" result for any drug will establish "use" for purposes of this policy. A "confirmed positive" post accident drug test will lead to termination of employment. Employee may reapply for employment after they have sought rehabilitation and were no longer using illegal drugs when they reapply.

PROCEDURES & REQUIREMENTS FOR REASONABLE SUSPICION DRUG TESTING:

Any employee that Metalcraft of Mayville has reason to believe is under the influence of a controlled substance or alcohol will be required to submit to a urine drug test and a breath alcohol test. The urine drug test will be handled according to established protocols that are already in place for Metalcraft of Mayville drug testing programs that follow DOT guidelines for federally mandated drug testing programs. Reasonable suspicion must be based on specific personal observation (appearance, behavior, speech or breath) of at least two Metalcraft of Mayville Supervisors/Managers in writing.