



**Light & Wonder, Inc.**  
**SUBSTANCE ABUSE POLICY FOR EMPLOYEES**

(FOR TESTING TO BE CONDUCTED IN ALL STATES (EXCEPT MONTANA AND VERMONT), THE DISTRICT OF COLUMBIA AND PUERTO RICO [INCLUDING BOULDER, CO. AND SAN FRANCISCO, CA.]).

**1.0 STATEMENT OF PURPOSE**

- 1.1 Light & Wonder, Inc. , and its subsidiaries in the United States, (referred to herein as “Company”) is firmly committed to ensuring a safe, healthy, productive and efficient work environment for our employees, as well as our customers, and the public in general. The unlawful presence of controlled substances in the workplace conflicts with these vital interests. For these reasons, we have established, as a condition of employment and continued employment, the following substance abuse policy. As provided below, drug and alcohol testing is an integral part of our substance abuse policy. Compliance with the policy is required as a condition of continued employment with the Company.
- 1.2 This policy applies to all Company employees, including employees in managerial or supervisory positions.
- 1.3 The Company maintains a policy of non-discrimination and will endeavor to make reasonable accommodations to assist recovering addicts or alcoholics and those having a medical history reflecting treatment for substance abuse conditions. We encourage employees to seek assistance before their drug and alcohol use renders them unable to perform their essential job functions or jeopardizes the health and safety of themselves or others.
- 1.4 Questions regarding the meaning or application of this policy should be directed to the Company’s Human Resource Department.
- 1.5 This policy is not a contract of employment. All Company employees are employees at-will, except as state or local law may limit such status, and employment can be terminated either by the employee or the Company at any time with or without cause and with or without notice. Where any provision of this policy conflicts with the provisions of a collective bargaining agreement between the Company and a union representing its employees, the provisions of the collective bargaining agreement will control. However, failure to comply with this policy as so interpreted shall constitute just cause for discipline, up to and including discharge.

## 2.0 **PROHIBITED CONDUCT**

### 2.1 Prohibited Conduct Concerning Alcohol And Drugs

The following conduct by employees is prohibited:

- a. Reporting for work or remaining on duty after the employee has consumed alcohol in any amount that adversely affects the employee's job performance.
- b. Consuming alcohol at any time during an employee's workday. This includes, but is not limited to, while an employee is on or off the premises of the Company, as well as during the employee's meal and other break periods.
  - (i) Exception: This prohibition does not include the authorized and reasonable consumption of alcohol by an employee of legal drinking age at functions or activities sponsored by the Company or a client. However, responsible, professional, business-like behavior is expected of employees (including management) at all times. Inappropriate, unprofessional behavior associated with alcohol consumption may subject employees (including management) to disciplinary action, up to and including termination.
- c. Engaging in any illegal or unauthorized use of drugs at any time while on or off-duty. This includes, but is not limited to, while an employee is on or off the premises of the Company, as well as during the employee's meal and other break periods.
  - (i) This prohibition does not apply to prescription or over-the-counter medications taken by employees in safety-sensitive positions which:
    - (1) have been lawfully prescribed to, or obtained by, the employee;
    - (2) are being used by the employee in accordance with the prescription's guidelines (if applicable); and
    - (3) before reporting to work under the influence of such medication, the employee has inquired whether the drug manufacturer or the employee's physician warns against driving, operating machinery or performing other work-related safety-sensitive tasks. If such warnings exist, the employee taking the medication must inform his or her supervisor of such restrictions before reporting to work under the influence of such substances. When informing his

or her supervisor(s) or the Human Resource Department of such restrictions, the employee should not identify the medication(s) being used or the reason for its use. The Company will evaluate and respond to this information on a case-by-case basis. Responses may include, among other things, temporary job reassignment or modifications, a request for additional medical documentation and consultation, and/or an instruction that the employee not work until the restriction is removed. Any employee reporting to work in a safety-sensitive position without first advising the Company about warnings accompanying lawfully prescribed or obtained medications will be subject to disciplinary action up to and including possible termination of employment. An employee's lack of knowledge concerning such warnings will not excuse a violation of this rule where an employee has failed to make the inquiries required by this rule.

- (ii) "Safety-sensitive positions" are generally defined as those positions designated by the Company as safety-sensitive or those jobs that include tasks or duties that the Company in good faith believes could affect the safety or health of the employee performing the task or others, including but not limited to the following categories of jobs: (a) operating a motor vehicle, other vehicle, equipment, machinery or power tools; (b) repairing, maintaining or monitoring the performance or operation of any equipment, machinery or manufacturing process, the malfunction or disruption of which could result in injury or property damage; (c) performing duties in the residential or commercial premises of a customer, supplies or vendor; or (d) otherwise as defined in applicable state or local law.
- d. Using or possessing "recreational marijuana" or "medical marijuana" in the workplace. All employees are prohibited from being under the influence of marijuana while at work. Employees who use recreational marijuana while off-duty in states where it is legal may test positive on a drug test required under this policy. Positive test results will not be excused by the "recreational" use of marijuana. Employees who use "medical marijuana" in states where it is legal must report this use to their supervisor or Human Resources, as described above, so that the Company may analyze the potential safety risk. The Company will comply with applicable state laws with regard to the use of "medical marijuana" to the extent that those laws impose any obligations on employers and to the extent that safety is not compromised.

- e. Failing to stay in contact with the Company or its medical review officer while awaiting the results of a drug test.
- f. Engaging in the unlawful or unauthorized manufacture, distribution, dispensation, solicitation, sale, purchase, transfer or possession of drugs or alcohol while on Company-paid time, on Company premises, in Company vehicles, or while otherwise engaged in activities for or on behalf of the Company. This prohibition does not include the authorized distribution, dispensation, solicitation, sale, purchase, transfer or possession of alcohol at Company sponsored functions or activities. In addition, an employee's illegal conduct involving drugs or alcohol during non-work times may also result in discipline, up to and including discharge.
- g. The refusal to submit to any drug or alcohol test that is required under the Company's policy will result in the employee's immediate termination of employment. This includes tests which employees agree to take in conjunction with rehabilitation provided under Section 7.0.
- h. Testing positive on any drug or alcohol test required under this policy.

2.2 Refusal to Submit to a Test: An employee who engages in any of the following conduct will be considered to have refused to submit to a test:

- a. refusing or failing to appear for any substance abuse test within a specified time, as determined by the Company, after being directed to do so by the Company;
- b. failing to sign an authorization form permitting the release of the drug and/or alcohol test result to the Company;
- c. failing to remain at the testing site until the testing process is complete;
- d. failing to provide a urine, blood, breath or saliva specimen for testing;
- e. failing to attempt to provide a urine, breath or saliva specimen for testing;
- f. failing to provide a sufficient amount of urine or breath when directed, without an adequate medical explanation;
- g. failing or declining to take a second drug or alcohol test that the Company or collector has directed to be taken;
- h. failing to undergo a medical examination or evaluation, as directed by the MRO as part of the verification process, or as directed by the Company as part of the "shy bladder" procedures, or the insufficient breath procedures;

- i. adulterating or substituting a urine specimen, or attempting to adulterate or substitute a urine specimen;
- j. in the case of a directly observed or monitored collection in a drug test, failing to permit the observation or monitoring of the provision of a urine specimen (unless prohibited by law); or,
- k. failing to cooperate with any part of the testing process such as by delaying the collection, testing or verification process or otherwise engaging in conduct that clearly obstructs or manipulates, or attempts to obstruct or manipulate, the testing process.

2.3 Consumption of Food or Food-Products Containing Hemp: The consumption of food and food-products containing hemp may cause an employee to test positive. A test result that is positive as a result of an employee's consumption of food or food-products containing or made from hemp or hemp products will be reported as a positive test and subject the employee to discipline, up to and including termination.

2.4 Prohibition On Employee Working: No supervisor or manager who has actual knowledge that an employee has engaged in or is engaging in conduct prohibited under this policy shall permit the employee to work or continue working under such circumstances. Any employee who has been directed not to work or directed to stop working under such circumstances must immediately comply.

2.5 Criminal Penalties: There may be criminal penalties for the illegal production, distribution, consumption, possession or trafficking of controlled substances under applicable federal, state, local and/or Puerto Rico laws.

### 3.0 **REASONABLE SUSPICION DRUG AND ALCOHOL TESTING**

Except as otherwise provided in this policy, employees are required to submit to testing under the circumstances described below. Except where conditions otherwise require, all tests will normally be conducted either during or immediately after the regular work period, which includes any period when an employee is working overtime. Employees will be paid for time spent being tested.

#### 3.1 "Reasonable Suspicion" Drug and Alcohol Testing

- a. An employee must submit to a drug test and/or an alcohol test whenever the Company has, in accordance with the applicable state law, reason to suspect the employee has or may have used drugs or alcohol in violation of the Company's policy. Employees represented by a union who are selected for "reasonable suspicion testing" may request union representation during discussions with the Company regarding such testing.

- b. Except as state or local law may otherwise provide, the Company's "reasonable suspicion" determinations will be based on specific, current observations that can be verbalized, including but not limited to the employee's appearance, behavior, speech, or body odors. These observations may also include indications of an employee's chronic use of, or the effects of withdrawal from, drugs or alcohol.
- c. All "reasonable suspicion" tests must be administered as soon as possible following the determination.
- d. The Company shall transport or make arrangements for the transport of the employee to and from the collection site.
- e. An employee who is required to submit to a "reasonable suspicion" test will be suspended after the completion of the drug or alcohol tests, pending receipt of the test results. The Company also reserves the right to evaluate the employee's conduct that triggered the drug and/or alcohol test, to determine if the conduct in and of itself warrants discipline, up to and including termination.

#### 4.0 **CONSEQUENCES FOR POLICY VIOLATIONS.**

Employees who violate the Company's policy are subject to the following consequences:

- 4.1 **Refusal To Submit:** Although employees have a right to refuse to submit to a test, employees who refuse to submit to a test when requested will be terminated from employment. Refer to Section 2.2 of this policy for a description of the conduct which will be considered as a refusal to submit to a test.
- 4.2 **Positive Test Results:** Any employee who receives a verified positive drug test result or a confirmed alcohol test result of 0.04 BAC or greater are subject to termination.
- 4.3 **Other Policy Violations:** In the event an employee violates this policy in other ways, the employee will be immediately removed from his or her job duties and will be subject to discipline, up to and including termination. In addition to the consequences imposed under this policy, an employee who unlawfully manufactures, distributes, possesses, or uses a controlled substance may be subject to criminal fines and/or imprisonment under federal, state and/or local law.
- 4.4 **Fitness-For-Duty Evaluation:** Whenever an employee is required to submit to a "reasonable suspicion" test and receives a negative test result, the Company may require the employee to submit to a fitness-for-duty evaluation. The evaluation may include a review of the employee's medical records and/or a medical examination. The purpose of the evaluation is to determine whether the employee poses a significant risk of substantial harm to the health and safety of the employee

or others in the workplace, including customers and visitors. Employees will be required to provide the necessary authorizations for obtaining the medical records and conducting the examination. Depending upon the results of the evaluation, the Company will consider whether the safety or health risk can be eliminated or sufficiently reduced by a reasonable accommodation, if applicable.

- 4.5 Potential Loss of Workers' Compensation and/or Unemployment Compensation Benefits: An employee's violation of the Company's policy will be considered as gross and willful misconduct. In addition to the discipline and other consequences imposed under this policy, therefore, such employee misconduct may also result in the denial of unemployment compensation under applicable state law. Additionally, employees who are injured as a result of using drugs or alcohol in violation of this policy and/or the other Company safety rules also risk forfeiture of workers' compensation benefits under the applicable state law. In West Virginia, an injured employee who refuses to submit to drug and/or alcohol testing forfeits eligibility for unemployment compensation benefits, and if injured, for indemnity benefits under the Worker Compensation Laws.

## 5.0 NOTIFICATION OF TEST RESULTS, CONFIDENTIALITY, TESTING EXPENSES AND COMPENSATION FOR TESTS

- 5.1 Employees will be provided with a copy of their test results if they test positive, unless otherwise required by law. Employees located in Boulder, Colorado, may obtain, upon request, a copy of the records pertaining to their verified positive tests results, and to submit written information explaining such results. In Iowa, written notification of a verified positive drug test result conducted pursuant to this policy also will be provide to a parent of a minor employee by certified mail, return receipt requested.
- 5.2 The Company will maintain records of its substance abuse program in a secure location with controlled access. These records are confidential and will not be disclosed, except in accordance with applicable law.
- 5.3 The Company will pay for all drug or alcohol tests required by the Company, which includes a confirmation drug test performed on an employee's primary urine specimen. The Company will also pay for the cost of the employee's transportation to a collection site when the test is conducted at a place other than the employee's normal work site.
- 5.4 All time an employee spends providing a specimen for testing, including travel time to and from the collection site in order to comply with a test required under this policy, shall be considered as working time.

## 6.0 TESTING PROCEDURES

The Company's drug and alcohol testing procedures comply with applicable state and local law. The Company's procedures ensure the integrity, confidentiality and reliability of the testing process, safeguard the validity of the test results and ensure that test results are attributed to the correct individual. The procedures also minimize the impact upon the privacy and dignity of employees undergoing such tests.

#### 6.1 **Drug Testing.**

In Iowa, the Company's drug testing procedures comply with Iowa Code Ann. §730.5. Drug testing will be conducted via urine testing. The Company has established a chain of custody procedure for urine specimen collection and testing that will verify the identity of each urine specimen and test result.

##### a. **Laboratories.**

In general, drug tests will be administered at outside collection facilities and analyzed by laboratories which are certified by the Substance Abuse and Mental Health Services Administration (SAMHSA), an agency of the U.S. Department of Health and Human Services (DHHS) ("SAMHSA-certified laboratory" or "DHHS-certified laboratory") or are otherwise required or permitted to be used under applicable state law.

##### b. **Drugs to be tested for.**

Unless otherwise prohibited by law, the Company will test for the following drugs: amphetamines (including Ecstasy), barbiturates, benzodiazepines, cocaine, marijuana, methadone, methaqualone, opiates, oxycodone, phencyclidine (PCP), propoxyphene and their metabolites. In Kansas, the Company will test only for amphetamines, cocaine, marijuana, opiates and PCP. In Oklahoma, the Company will test for drugs and alcohol as defined in the Standards for Workplace Drug and Alcohol Testing Act, including controlled substances approved for testing by the State Commissioner of Health.

##### c. **Confirmation and review of drug test results.**

All positive drug test results will be confirmed by gas chromatography and mass spectrometry ("GC/MS"). All confirmed positive drug test results will be reviewed by a medical review officer ("MRO") to determine whether there is any legitimate explanation for the positive test result. This review may include a medical interview, review of the employee's medical history, or review of any other relevant biomedical factors and all medical records made available by the employee.

An employee's use of prescription and over-the-counter medications may result in a positive test result. Employees will be given the opportunity to discuss with the MRO any legitimate explanation for the positive test result. Employees may provide any information which may be considered relevant to the test, including identification of prescription or nonprescription drugs currently or recently used, or other relevant medical information. If the MRO determines that there is a legitimate medical explanation for the confirmed positive test result, the MRO will report the test result as negative. If the MRO determines that there is no legitimate explanation for



the confirmed positive test result, the result will be verified by the MRO as a confirmed positive test. If an employee refuses or fails to make himself/herself available to speak with the MRO, the MRO may verify a test as positive without having communicated directly with the tested individual.

If the MRO reports to the Company that a negative drug test was dilute, the employee will be directed to take another test immediately. If the employee refuses to take a second test, this constitutes a refusal to test. If the second test is negative dilute, the test stands as a negative.

d. **Right to have confirmatory re-test:**

Employees whose primary specimen is verified positive may request a confirmatory re-test of the original specimen, at their own expense (unless otherwise provided by law), in a different SAMHSA-certified laboratory (or other laboratory required or permitted under state law) selected by the Company, unless otherwise required by law. In general, this request must be made by the employee within 72 hours of being notified by the MRO of a verified positive test result (unless otherwise required or permitted under state law). However, in certain states, including Iowa, Maryland, Minnesota, and North Carolina, employees who test positive will be notified by the Company in writing of their test results and will be advised of the time period in which to request a confirmatory re-test. No other appeal procedure is available.

e. **Inability to provide adequate amount of urine.**

Employees must provide at least 45 milliliters of urine for a drug test. If the employee is unable to provide such a quantity of urine, then the individual will be instructed to drink a set amount of fluids and, after a set period of time, again directed to provide a complete specimen. If the employee refuses to drink the fluids as directed, or refuses to provide a new urine specimen, this will constitute a refusal to submit to a test. If an employee has not provided a sufficient specimen within a certain time period after the first unsuccessful attempt to provide the specimen, the Company will direct the employee to submit to blood testing, where permitted by law. If blood testing is not permitted by law or is not feasible, the employee will be directed to submit to a medical evaluation, as soon as possible, from a physician selected by the Company. If the physician determines that there is no legitimate medical explanation for the individual's failure to provide an adequate amount of urine, this will constitute a refusal to submit to a test. If the physician determines that there is a legitimate medical explanation for the individual's failure to provide an adequate amount of urine, the Company, in consultation with the physician or MRO, will determine whether the employee should be retested, including whether a reasonable accommodation, if applicable, can be made which will provide an adequate, accurate and timely test result that will not impose an undue hardship on the program.

f. **Adulterated or Substituted urine specimens.**

Procedures for collecting specimens allow an individual privacy unless there is a reason to believe that a particular individual may adulterate or substitute the specimen. In such cases, a specimen may be obtained under the direct observation of a collection site person of the same gender as the employee, unless prohibited by law.

## 6.2 **Alcohol Testing.**

### a. **In general:**

Except as provided in subsection d. below, alcohol screening tests will be performed by a certified technician using an evidential breath testing device which the technician is proficient to operate. The Company will only use alcohol screening devices that are on the National Highway Traffic Safety Administration's ("NHTSA") Conforming Products List ("CPL").

### b. **Confirmation of alcohol test results and threshold for positive test results:**

If the result of the screening test is an alcohol concentration of 0.02 or greater, a confirmation test will be performed. The confirmation test will be conducted within 30 minutes from the end of the screening test. The confirmation test result is the final result upon which any discipline or other action taken under the Company's policy shall be based. The Company will consider .04 BAC or greater to be a positive test result.

### c. **Inability to provide adequate specimen amount for alcohol testing:**

Each employee shall blow forcefully into the mouthpiece of the EBT for at least six (6) seconds or until the EBT indicates that an adequate amount of breath has been obtained. If an employee fails to provide or claims that he or she is unable to provide a sufficient amount of breath to permit a valid breath test, the Company will direct the employee to submit to blood testing, where permitted by law. If blood testing is not permitted by law or is not feasible, then the Company will direct the employee to obtain, within five days, an evaluation from a licensed physician who is acceptable to the Company and who has expertise in the medical issues raised by the employee's failure to provide a sufficient specimen. Failure to undergo such an evaluation constitutes a refusal to test. If the physician concludes that a medical condition has, or with a high degree of probability could have, precluded the employee from providing a sufficient amount of breath, the employee's test will be canceled. If the physician concludes that there is not an adequate basis for determining that a medical condition has, or with a high degree of probability could have, precluded the employee from providing a sufficient amount of breath, the employee will be considered to have refused to test.

### d. **Alcohol Testing in Hawaii, Louisiana, Maryland, Minnesota, Boulder, CO., and San Francisco, CA.**

When alcohol testing is required in Hawaii, Louisiana, Maryland, Minnesota, Boulder, CO., and San Francisco, CA., the Company will direct the employee to submit to a blood

test. Blood tests will be analyzed at a certified laboratory and positive test results will be subject to confirmatory testing conducted by gas chromatography and mass spectrometry ("GC/MS") as well as MRO review.

An employee who receives a verified positive blood alcohol test result may request a confirmatory "re-test" of the original blood specimen at a different SAMHSA-certified laboratory (or other laboratory required or permitted under state law) selected by the Company. This request must be made by the employee within 72 hours of being notified by the MRO of a verified positive test result (unless otherwise required or permitted under state law).

## 7.0 **SELF-IDENTIFICATION OF SUBSTANCE ABUSE PROBLEM**

- 7.1 Consistent with and subject to the Company's policies concerning the Family and Medical Leave Act, and personal leaves and paid time off, employees who voluntarily self-identify themselves as having a drug or alcohol problem and who voluntarily request assistance for such problem will be referred to a substance abuse professional for an evaluation and for an appropriate counseling, treatment or rehabilitation program, if recommended. The cost of the evaluation and any counseling, treatment or rehabilitation is the employee's responsibility. (For further details concerning the employee's payment obligations, employees should refer to their individual medical insurance plan.)
- 7.2 This request must be made before the employee is required to submit to a drug or alcohol test required by this policy. Employees may not use this self-identification provision to avoid taking a test when required under this policy or to avoid being disciplined for receiving a positive test result or for refusing to submit to a test (refer to Section 2.2 for a description of conduct that constitutes a refusal to submit to a test).
- 7.3 Once leave commences, periodic certification that the employee is actively continuing to participate in the program, together with progress reports, shall also be required. As a further condition of taking such leave, the employee will be required to authorize the attending substance abuse professional to communicate directly with the Company, including to release the employee's relevant treatment records to the Company, except as federal or state law may otherwise require. All such oral and written communications between the substance abuse professional and the Company shall be treated as confidential.
- 7.4 Except where the federal or state law prohibits, all leave time taken for the evaluation, counseling, treatment or rehabilitation will be counted against the leave to which the employee may be entitled under the federal or state Family and Medical Leave laws, or other applicable leave policy, if any.
- 7.5 In accordance with the applicable "Agreement For Voluntary Treatment and Conditions for Continued Employment" executed by the employee prior to the commencement of such leave, the employee may be required to submit to a return-

to-duty drug test as a condition of returning to work and receive a negative result. In some cases an employee may be required to submit to a return-to-duty alcohol test as a condition of returning to duty, and if tested, must receive a negative test result. The employee may also be required to submit to unannounced follow-up drug tests and/or unannounced follow-up alcohol tests as part of the program.

## 8.0 **INSPECTIONS**

- 8.1 **Inspections Of Company Property:** The Company may conduct unannounced random inspections at any time and without cause for the presence of illegal drugs or unauthorized alcohol on Company facilities and property such as (but not limited to) Company-issued vehicles, desks, file cabinets, and lockers. Employees are expected to cooperate in the conduct of such inspections.
- 8.2 **Inspections Of Individual Property:** Personal inspections of employees and their personal property, such as (but not limited to) vehicles, clothing, packages, purses, brief cases, lunch boxes, or other containers brought onto or being taken off of Company premises, may be conducted by the Company when there is reasonable suspicion to believe that the individual may have or has violated the drug or alcohol prohibitions contained in this policy.

## 9.0 **EMPLOYEE ASSISTANCE PLAN.**

- 9.1 As part of the Company's commitment to provide a safe, healthy and efficient working environment for our employees, the Company maintains an Employee Assistance Program ("EAP"). The EAP provides information concerning the effects and consequences of alcohol and drug use on an individual's health, work, and personal life and the signs and symptoms of an alcohol or drug problem. In addition, the EAP provides referral services to employees and their families seeking help with problems resulting from alcohol misuse and drug use. Except for mandatory referrals by the Company, participation in this program is voluntary and confidential. The EAP can discuss available counseling, treatment and rehabilitation programs, fiscal responsibilities, and can help the employee decide what program might be best for his or her situation. For further information or to arrange an appointment, employees may contact the EAP at the following number/website:

**Contact Your  
GuidanceResources® Program**

Call: 833.812.5179

TTY: 800.697.0353

Online: [guidanceresources.com](http://guidanceresources.com)

App: GuidanceResources® Now

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10.0 **DRUG-FREE WORKPLACE POLICY (to comply with the federal Drug-Free Workplace Act).**

10.1 **Prohibition Against Unlawful Presence of Controlled Substances in the Workplace.**

The unlawful manufacture, distribution, dispensation, possession or use of a controlled substance on our premises, in the Company's vehicles or while engaged in the Company's activities is strictly prohibited.

10.2 **Notification of Workplace Drug Conviction.**

You must notify the Human Resources Department of any criminal drug statute conviction for a violation occurring within the workplace within five (5) days of such conviction. Within ten (10) days of such notification or other actual notice, the Company will advise the contracting agency of such conviction.

10.3 **Compliance as a Condition of Employment.**

All employees are hereby advised that full compliance with the foregoing policies shall be a condition of employment at the Company.

10.4 **Sanctions for Violation of Drug-Free Workplace Policy.**

Any employee who violates the foregoing drug-free workplace policy described above shall be subject to discipline up to and including immediate discharge.

10.5 **Required Participation in Drug Rehabilitation.**

In the discretion of the Company, any employee who violates our drug-free workplace policy may be required, in connection with or in lieu of disciplinary sanctions, to participate to the Company's satisfaction in an approved drug assistance or rehabilitation program.

10.6 **Drug-Free Awareness Program.**

In order to maintain a drug-free workplace, the Company has established a drug-free awareness program to educate employees on the dangers of drug abuse in the workplace, our drug-free workplace policy, the availability of any drug-free counseling, rehabilitation and employee assistance programs and the penalties that may be imposed for violations of our drug-free workplace policy.