



Substance Abuse Policy

Grunloh Construction is committed to providing a drug free environment. Not only can the use and/or abuse of drugs and alcohol jeopardize the health, safety and well-being of the individual user and other co-workers, but it also results in absenteeism and productivity concerns, higher workers' compensation costs and health/disability premiums, and endangers the safety of the general public and invitees to our company.

Since our employees are our most valuable resources, and the safety of our employees and the public are important to us, we have developed and published this substance abuse policy to help us contribute to the solution of this very difficult health and social problem. Our policy is intended to accurately detect and deter the use and abuse of drugs and alcohol in our workplace, while respecting the dignity and privacy of all of our employees.

This company is required by the Illinois law known as public act 095-0635 to comply with all noted provisions therein effective from January 1, 2008. Those provisions establish reasonable bases to ensure that the legitimate needs of the employees are balanced properly against the Company's concerns of protecting the workplace and our employees. To integrate our union contractual agreements and our safety policy our union employees in agreement with their respective union affiliates have agreed to the testing services provided by Construction Data Services (CDS) and undergo the full regime that is outlined by the testing service.

Therefore, it is the policy of the Company that the possession, sale or use of illegal drugs is not consistent with the Company's needs to operate in a safe and efficient fashion. For that reason, no employee of the company may use or possess unlawful drugs, i.e., any substance found on the list of controlled substances issued by the Food and Drug Administration now or in the future, at any time. This policy also prohibits employees from such use that impairs his/her performance of work on the job, as well as prohibiting use while on Company business at any time, whether on the property or off. In addition, while this Company has no desire to intrude upon the private activities of its employees when they are away from Company property and not on Company time, involvement with unlawful drugs, including their manufacture or distribution, constitutes a severe breach of accepted conduct and is also prohibited. Employees are also prohibited from bringing prescription drugs on Company property, unless they have been prescribed by a licensed physician, such drugs can only be utilized by employees receiving such prescriptions in the manner, combination and quantity prescribed. In instances where any employee holds a

position which this Company considers to be safety sensitive, we must be notified by the employee that the use of prescription drugs on the job will not impair the individual's working abilities by a suitable statement from the prescribing physician.

Employees are also prohibited from using alcoholic beverages during working hours or within six (6) hours prior to reporting for duty, and/or being under the influence of alcohol while at work or on Company time. Nor may any employee use or possess alcohol on Company property in any unauthorized manner, or bring alcohol unto the Company's property for the purpose of such use.

Any employee who is convicted of a crime involving the violation of any Federal or non-federal statute prohibiting the manufacture, sale, distribution, possession or use of any controlled substance in the work place must notify the Company within five (5) days after such conviction.

Violation of any portion of this policy will subject the employee to appropriate disciplinary measures, up to and including termination. All employees in positions considered by the Company to be safety sensitive shall be subject to urine testing prior to employment or job assignment, following an accident on Company property or on Company business or prior to return to duty if they have failed a previous test. Moreover, any employee whose conduct, appearance or behavior may tend to suggest that the individual is impaired or otherwise not fit to perform the tasks of his or her job and is under the influence of drugs or alcohol, will be required to submit to urine testing.

If any of the above mentioned testing conditions are met, a confirmed positive test will lead to discipline, up to and including termination, or a requirement that the individual undergo and successfully complete rehabilitation or treatment/counseling program, or both. Employees who have failed a previous test may be subject to unannounced follow-up testing for a period of one (1) year after their return to duty. Refusal to submit to urine testing, or adulteration of specimen for testing, shall subject the employee to termination, or in the case of an applicant, to elimination from consideration for the position for which the individual as applied.

The Company's decision to test employees and job applicants has been made to assist the Company in advancing the objectives of this Substance Abuse Policy. All testing will be conducted in compliance with the guidelines adopted by the National Institute of Drug Abuse, except that the Company may test for alcohol and additional controlled substances, and the Company may decide not to use the service of a Medical Review Officer (MRO). All testing will be conducted using accepted professional and technical standards and in a manner which respects and recognizes the dignity and privacy of our employees. The Company will endeavor, to the greatest extent possible, to protect the confidentiality of information regarding individual test results. The Company will not discriminate against any employee who is covered by the Americans with Disabilities Act.

The Company has established a drug awareness program for its employees, which will include education and training about the dangers of drugs and alcohol in the workplace, the elements of this policy statement and the penalties it contains, and available counseling, treatment and rehabilitation that an employee may receive. The Company will provide information on appropriate assistance programs and “wellness” clinics to any employee who feels he or she may have a problem with chemical dependency or the use of alcohol. The company encourages its employees to participate in such assistance programs, treatment facilities, or other similar programs, and notes that participation in an appropriate assistance program may be covered, in part, under the Company existing health/disability benefits. However, the Company will offer on-time additional financial assistance, up to a full reimbursement, to an employee who voluntarily seeks assistance in a accredited program, only where it is the individuals first treatment, and only before any positive test has occurred.

Employees who are directed or recommended, by a licensed physician, to be admitted to an accredited in-patient drug/alcohol treatment program may also be eligible for salary continuation benefits, on a one-time basis, for a maximum of sixty (60) days. The Company will continue to make premium payments for the employee’s health and or disability insurance plan(s). The Company will treat the details of any employee’s participation in an assistance program confidentially, to the greatest extent possible, to ensure that the employee’s privacy is respected.

The elements of the Substance Abuse Policy are intended to achieve the overall goal of fostering a drug-free workplace and a healthy, safe environment for our employees. Although this policy has been carefully written to address all of the concerns in this sensitive area, the Company reserves the right to modify or amend it. Employees will be notified if any changes are made.

A copy of this Substance Abuse Policy will be provided to every person hired by the Company, to any person offered conditional employment, and upon request, to any job applicant. Its receipt and acknowledgement by each employee or conditional employee is required on the Company’s Informed Consent and Release Form.

Printed Name of Acknowledged Recipient

Date

Signature of Acknowledged Recipient

Date

Printed Name of Grunloh Construction, Inc. Administrator

Date

Signature of Grunloh Construction, Inc. Administrator

Date

