

TITLE: Field Staff Drug & Alcohol Policy	REFERENCE #: IGV-OPS-POL-0200
DEPARTMENT: Operations	APPROVAL DATE: 08/25/2025
CATEGORY: Field Staff	EFFECTIVE DATE: 09/08/2025
APPROVER: Michael Flaim	NEXT REVIEW DATE: 09/08/2026

1.0 Purpose and Scope

Ingenovis Health, Inc., its affiliates, and subsidiaries (“Ingenovis” or the “Company”) is committed to ensuring a safe and healthy workplace. To advance this commitment, the Company has enacted this Field Staff Drug and Alcohol Policy (the “Policy”), which aims to maintain a drug and alcohol-free work environment. This Policy applies to all Field Staff Applicants and Field Staff Employees, as defined below.

2.0 Sanctions & Enforcement

The Company may take disciplinary action if an Employee violates this Policy. Violations of this Policy may result in disciplinary action up to and including termination of employment or revocation of an Applicant’s offer of employment. Violations of this Policy include:

- An Applicant or Employee’s provision of a sample that results in a test result that is positive for an unauthorized substance;
- Refusal to submit to a proper Company- or Client-required test;
- Engaging in any behavior designed to obstruct the testing process, including but not limited to efforts to substitute, adulterate, or dilute specimens, failing to appear for testing within a reasonable time, and failing to cooperate with collection staff;
- The use, possession, consumption, purchase, sale, or distribution of any illegal or unauthorized substance (as defined below) while on Company or Client property or while performing services for the Company or any Client;
- Reporting to work or performing services for the Company or any Client if an Employee is under the influence of or impaired by any illegal drug or unauthorized substance, including alcohol; and
- Engaging in the unlawful possession, use, manufacture, or sale of any controlled substance, regardless of whether such conduct occurred on or off Company property or during working hours.

3.0 Policy

Policy Statement

The Company prohibits the use, possession, consumption, purchase, sale, or distribution of any illegal or unauthorized substance (as defined below) while on Company or Client property or while working for the Company or for any Client. In addition, the Company prohibits Employees from reporting to work or working if they are under the influence of or impaired by any illegal drug or unauthorized substance, including alcohol.

In addition, the Company prohibits Employees from engaging in the illegal possession, use, manufacture, or sale of any controlled substance, regardless of whether such conduct occurs on or off Company property or during working hours. Employees who engage in illegal conduct while off-duty may be subject to discipline, up to and including termination of employment, when permitted by applicable law.

The Company will implement this Policy in a manner that complies with all applicable federal, state, and local laws. If a particular location's laws differ from any provision in this Policy, the Company will interpret and implement this Policy to comply with those laws.

4.0 Standards

Reference #	Standard
0100.01	<p>Definitions</p> <ul style="list-style-type: none"> • Applicant: Any individual who has applied to become an Employee (as defined below) or any contractor or third-party contingent worker who is assigned to provide services to Clients (as defined below) in the field (also referred to as "Field Staff Applicants"). • Company: All Ingenovis Health Brands and companies • Client: Any entity with which the Company has a direct or indirect agreement through which the Company provides staffing services • Employee: All current full-time, part-time, per-diem, or seasonal employees and contractors of the Company operating in the field on behalf of the Company's Clients (also referred to as "Field Staff Employees"). • Unauthorized Substance: Any controlled substance that is unlawful to use or possess as a matter of applicable law, any prescription medication if not prescribed to the Employee or that is used other than as prescribed to the Employee, any misuse of any over-the-counter medication, and any substance that operates as an intoxicant or causes impairment, including alcohol. • Safety Sensitive: A description applicable to any position that, based on its nature, location, or surroundings, could pose an unreasonable threat to the health or safety of another person, including a patient, coworker, Client, or member of the public, if performed under the influence of a controlled substance that impairs the user's cognitive or motor function. This definition includes, but is not limited to, positions that provide in-person patient care, interact with vulnerable populations, such as minor or elderly populations, or who are responsible for reviewing or refilling prescriptions or administering medication.
0100.02	<p>Drug and Alcohol Use</p> <p>Impairment: Employees cannot come to work or perform any work for the Company or any for Client while impaired by any Unauthorized Substance.</p> <p>Lawfully Prescribed and Over-the-Counter Medications: Except for medical marijuana (which is addressed separately in the Marijuana Guidelines section), Employees may take prescription medication and over-the-counter medications at work and during working hours, but only if such use does not impair the Employee's</p>

Reference #	Standard
	<p>ability to perform the duties and responsibilities of their role safely and successfully. The Company maintains the discretion to evaluate and decide if an Employee's lawful medication use is impairing their job performance or creating a safety risk for those with whom the Employee interacts.</p> <p>Employees must ask their healthcare providers if their prescribed or over-the-counter medication could cause any safety risk for them or others at work, or otherwise impact their work performance. If an Employee's lawful medication use has the potential to affect the Employee's work performance in any way, the Employee must disclose this information to the Professional Standards Team at profstandards@ingenovishealth.com. In such situations, the Company may ask Employees to provide a written note from a doctor confirming that the Employee can perform their job duties with or without accommodation.</p> <p>Alcohol Consumption at Social Functions: On occasion, alcohol may be served on Company or Client premises or events. When authorized by Company or Client management, employees who are 21 years of age or older may responsibly consume alcohol at sanctioned social events. At sanctioned social functions, the Company requires that Applicants or Employees who choose to consume alcohol:</p> <ul style="list-style-type: none"> • Act responsibly; • Consume only in reasonable quantities; • Avoid becoming intoxicated or impaired; • Avoid participating in activities that may pose elevated risk or endangerment to the Employee or to others; • Do not perform work on behalf of the Company and/or Clients following their consumption of alcohol; and • Avoid driving after consuming alcohol. <p>This section applies exclusively to alcohol offered at Company- or Client-sponsored social functions. Employees may not consume any other substance that may act as an intoxicant at such events, including but not limited to marijuana, even if that substance is legal to consume in the state in which the event occurs.</p> <p>Seeking Treatment: We encourage Employees who may be misusing any Unauthorized Substance (as defined above) to seek treatment or rehabilitation before (i) their work performance suffers, (ii) they risk the health and safety of themselves or others, or (iii) they violate this Policy. The Company provides the Employee Assistance Program (EAP) as one resource option. To confidentially request support¹, contact ComPsych at 1-888-628-4824 or https://www.guidanceresources.com.</p>

¹ Not currently available for employees of Corazon, LLC.

Reference #	Standard
	<p>The Company maintains a policy of non-discrimination and reasonable accommodation for Employees in substance abuse treatment and recovery, and those who have a medical history of treatment for substance abuse conditions. To avoid discipline under this Policy, an Employee's request to participate in the Company's EAP must occur before the Employee has been asked to submit to a Company- or Client-required screen, as well as before the Employee's conduct or performance violates this Policy or another Company policy.</p> <p>Notification of Drug-Related Convictions that Occurred in the Workplace: Employees must notify the Professional Standards Team at profstandards@ingenovishealth.com and their supervisor of any conviction under a criminal drug statute for a violation that occurred either in or outside the workplace. For purposes of this Policy, "conviction" means a finding of guilt (including a plea of <i>nolo contendere</i>) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes. Notification must be given no later than five days after the Conviction. The Company will consider the information disclosed in accordance with applicable legal requirements.</p> <p>Additional information: You can contact compliance@ingenovishealth.com for more information about this Policy. When local laws provide different requirements, those are the standards that the Company will follow. This policy may change from time to time, and Employees are responsible for ensuring they have reviewed and understand the most current version. To request the current copy of the Policy at any time, contact compliance@ingenovishealth.com.</p>
0100.03	<p>Scope of Drug & Alcohol Testing As permitted by law, the Company may require Applicants and Employees to take drug and/or alcohol tests in the circumstances described below. Depending on applicable law, the circumstances underlying the test, and the role an Applicant is applying to or that an Employee holds, the tests that Company performs may seek the presence of certain classes of drugs, or their metabolites, that includes, but is not limited to, the following: amphetamines (including methamphetamine, MDMA ("ecstasy"), MDA); methaqualone (Quaaludes); barbiturates (sleep aids, "downers"); benzodiazepines (Klonopin, Xanax); cocaine ("blow," "crack"), marijuana ("weed," "pot") and synthetic marijuana ("spice", K2), including 11-nor-9-carboxy-delta-9-tetrahydrocannabinol; opiates and opioids (for example, codeine, heroin, morphine, methadone, oxycodone, hydrocodone), phencyclidine (PCP, "angel dust"), propoxyphene, and alcohol.</p> <p>The Company has contracts with Clients that impose their own drug and/or alcohol testing requirements. Employees or Applicants covered by such contracts will be subject to drug testing in accordance with the requirements of the applicable Client contract, so long as the Client's screening requirements comply with applicable law.</p>

Reference #	Standard
0100.04	<p>Collection Process</p> <p>The Company will administer all tests in compliance with applicable law. Drug test samples may include oral fluids, urine, hair, or blood. Alcohol test samples may include breath, oral fluids, or urine. Tests will only seek for the presence of drugs and alcohol in an Employee's or Applicant's specimen. Alert your Recruiter or collector as soon as possible if you need an accommodation to participate in the testing process.</p> <p>All drug tests will include an initial screening test, which may include an instant or "point of collection" test. When required by applicable law, a certified laboratory will conduct a confirmation test of the specimen. Generally, the Company will perform a confirmatory test of all non-negative test results. Confirmatory testing will be performed on negative initial screening tests when legally required. Alcohol screening tests that produce a positive result will often be confirmed by a second test at the collection site or be sent to a lab for confirmation testing. An alcohol test will be considered positive if it shows the presence of 0.01% or more alcohol in an Employee's bloodstream, so long as permitted by applicable law.</p>
0100.05	<p>Drug & Alcohol Testing</p> <p>The Company may require that Applicants and Employees submit to the following types of drug and alcohol screening:</p> <p>Pre-Hire: Applicants applying for all positions as defined in Policy IGV-OPS-POL-0100 must submit to a drug test as a condition of hire.</p> <p>Client Assignment: When required by a Client, the Company may request Applicants and/or Employees to complete the Client's drug and/or alcohol screening process, which may include submitting to and passing a drug and/or alcohol test in advance of the assignment or periodically during the course of the assignment. For Applicants, this drug and/or alcohol test may supplement any pre-hire drug screen required by the Company. For Employees, when permitted by law, the Client-required screen may be performed at any time in advance of or during your assignment.</p> <p>Reasonable Suspicion: If the Company and/or Client has a reasonable suspicion that an Employee is under the influence or impaired by any authorized substance, the Employee may be required to submit to a reasonable suspicion drug and/or alcohol test. The requirement to submit to reasonable suspicion testing applies regardless of whether the Employee is employed in a Safety Sensitive position. The Company considers observations from supervisors, as well as credible reports from co-workers and others with whom an Employee has interacted on the job (including patients, family members of patients, or others occupying or working in Client facilities), when determining whether an Employee might be in violation of this Policy.</p>

Reference #	Standard
	<p>Subject to applicable law, reasonable suspicion may be based on observations including, but not limited to:</p> <ul style="list-style-type: none"> • Observed use of drugs or alcohol; • Performance decline; • Attendance issues; • Behavioral changes; • Changes in appearance; and • An odor of drugs or alcohol. <p style="text-align: center;">Reasonable Suspicion Response Protocol</p> <ul style="list-style-type: none"> • Observe & Document Supervisor records specific, observable signs using a standardized form. A second supervisor, manager or HR rep must independently verify observations. Reasonable suspicion must be based on observable, factual behaviors. • Remove from Duties & Arrange Transport Relieve employee of safety-sensitive tasks; ensure safe transport using a taxi or ride share, and document. Do not allow the employee to drive. • Administer Testing If alcohol is suspected, complete alcohol testing within 2 hours; stop attempts after 8 hours. • Act on Results and Document Apply policy-based actions for positive, refusal, or negative results. Maintain confidentiality Document investigation details and final outcome, including dates, locations and names. <p>Post-Accident Testing: If an Employee may have caused or contributed to an accident during working hours, the Employee may be required to submit to a post-accident test. Post-accident testing may occur when:</p> <ul style="list-style-type: none"> • The Employee or any individual involved in the accident was injured to the point that the Employee or individual (or any person acting on the Employee or person's behalf) either sought or received professional medical help; or • Property damage occurred. • Near misses of the above conditions. <p>Random Testing: Where permitted by law, Employees may be required to submit to random, suspicion-less, or unannounced drug testing. Employees subject to this type of testing will be chosen from the random testing pool by a third-party service.</p>

Reference #	Standard
	<p>If you have been selected for random testing, you must immediately go to the testing site as instructed.</p> <p>Return-to-work: If an Employee is returning to work after substance abuse treatment, the Employee may be required to submit to periodic drug and/or alcohol testing as part of the return-to-work process.</p>
0100.06	<p>Testing Procedures</p> <p>Consent and refusal to consent: The Company will not administer a drug or alcohol test without an Applicant or Employee's consent. Where applicable law requires, (1) the Company will pay the costs of all required drug and alcohol tests, and (2) Employees will be compensated for all time spent in the testing process.</p> <p>Refusal to submit to a proper test will be viewed as a violation of this Policy and will result in disciplinary action, up to and including termination of employment, revocation of a conditional offer, or termination of a service engagement. A refusal to test includes any behavior designed to obstruct the testing process. This includes efforts to substitute, adulterate, or dilute specimens, failing to appear for testing within a reasonable time, and failing to cooperate with collection staff.</p> <p>Notification: In most instances and whenever required by applicable law, if an Applicant or Employee's initial test shows a positive result for a controlled substance, the Applicant or Employee will be notified by a medical review officer ("MRO") before results are reported to the Company. The MRO will give the individual the opportunity to provide any legitimate medical explanation for the positive drug test result. If the MRO concludes that the explanation is valid and that the Employee or Applicant's use of a controlled substance does not create a safety risk, the MRO will report the test as negative to the Company. Depending on the position and the medication that the Employee or Applicant uses, the MRO may also advise the Company when lawful use of medication poses a safety concern. Where required by law, the Company will provide Applicants and Employees with copies of test results.</p> <p>Restrictions for Safety Sensitive roles: Employees working in or Applicants applying for roles that are Safety Sensitive and who fail any drug test due to a prescribed medication may be required to demonstrate that they are taking the medication in accordance with their healthcare provider's instructions and that their use of prescription medication will not impair their ability to work safely. If the Company determines that an Employee's or Applicant's prescription medication use creates an on-the-job risk, the Company will evaluate what reasonable accommodations may be available to that Applicant or Employee, in accordance with applicable legal requirements. This may include placing an Applicant or Employee in a role that is not considered Safety Sensitive, when such positions are available.</p>

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	<p>Requests for Re-test: Where required by law or at the Company's discretion, if an Applicant or Employee receives a confirmed positive drug or alcohol test result and believes that these results are inaccurate, the Applicant or Employee may request a re-test of the rest of the original sample. The Applicant or Employee request a re-test within 7 days of receiving notice of a positive test result, unless additional time is required by applicable law. You must send your request in writing to the Professional Standards team at profstandards@ingenovishealth.com. The Company will promptly direct the testing laboratory to conduct a re-test.</p> <p>Requests for re-tests of test results will not delay any action. The Company may place you on leave or fill an open position while awaiting test results. If the results of a re-test are reported as negative, that result will become the result of record. Where required by law, the Company will also provide a re-test and rebuttal process.</p> <p>Rehire Eligibility Following a Negative - Dilute Test Result: If an Applicant or Employee tests Negative - Dilute for controlled substances in connection with a pre or post-hire test, the Applicant or Employee will be given an opportunity to re-test and must do so within 48 hours. If the result of the second test is also Negative - Dilute, that result will be treated as a Positive test result and will become the final recorded result.</p> <p>Shy bladder/unable to give ample specimen for Pre-employment screens: an Applicant is permitted a one-time retest, within 48 hours. Failure to retest in 48 hours or failure to give ample specimen a second time, will be treated as non-negative result. The candidate will be eligible to retest after 15 days.</p> <p>*Failure to submit an adequate sample for a Reasonable Suspicion/For Cause initial screen is treated as Refusal to Test. No retests permitted for Reasonable Suspicion/For Cause. QA Committee to review.</p> <p>Rehire Eligibility Following Positive Test Result: If an Applicant tests positive for controlled substances in connection with a pre-hire test, the Applicant will be ineligible for hire for a period of 15 days (unless such practice is not in compliance with current applicable law), which is calculated from the date on which the Applicant was informed of a positive test result. If an Employee tests positive for controlled substances in connection with a post-hire test that results in termination, the Employee will be ineligible for rehire for 15 days (unless such practice is not in compliance with current applicable law), which is calculated from the Employee's termination date.</p> <p>Confidentiality Unless the Applicant or Employee consents, all test results and any information acquired by the Company in the testing process are confidential and managed in</p>

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	<p>accordance with applicable privacy laws. Test results will not be released to outside the Company or its Clients, unless required by law or legal process, or when relevant to a legal, administrative, or grievance action brought against the Company and/or Client by the tested individual.</p>
0100.07	<p>Marijuana Guidelines</p> <p>The Company may conduct pre- and post-hire testing for marijuana in jurisdictions where it is legally permissible to do so. The Company recognizes that some states and jurisdictions have legalized the recreational use of marijuana and/or have authorized the use of medical marijuana. In evaluating compliance with this Policy, the Company ascribes to the following guidelines when evaluating drug test results that are positive for marijuana.</p> <p>Company-Required or Company-Requested Drug Tests</p> <ul style="list-style-type: none"> • Medical Marijuana: If an Applicant or Employee tests positive for marijuana due to medical use and provides valid documentation of a medical marijuana prescription, the Company will accept the prescription as a legitimate explanation for the positive test. In such cases, the Applicant or Employee will be considered to have passed the Company's drug test, provided there is no evidence of marijuana use, possession, or impairment on Company premises or during working hours. • Recreational Marijuana: If an Applicant or Employee tests positive for marijuana due to recreational use in a state where such use is legal, the Company will consider the test as passing any Company-required test, provided that there is no evidence that the Applicant or Employee consumed, possessed, or was impaired by marijuana while on Company premises or during working hours. <p>Client-Required Drug Tests</p> <p>With respect to drug tests requested by or performed by a Client, if a Client's drug testing policy differs from the Company's, and the Client generally does not allow individuals with positive drug test results for marijuana to work at its facilities, the Company will evaluate whether alternative arrangements can be made. This may include requesting an exception to the Client's policy, ordering a retest the original sample on a panel that excludes marijuana, or identifying suitable alternative assignments. However, nothing in this Policy is intended to impose obligations on the Company beyond those required by applicable law. As a result, if an Applicant or Employee tests positive for marijuana in connection with a Client-required drug test, the Company reserves the right to revoke the Applicant's offer of employment or terminate the Employee's employment, so long as doing so is permitted by applicable law.</p> <p>Prohibition on On-the-Job Use, Possession, or Consumption of Marijuana:</p> <p>Under no circumstances may an Employee report to work or work while impaired by marijuana, including medical marijuana and recreational marijuana where such use</p>

Reference #	Standard
	is lawful. Employees who do so will be subject to disciplinary action, including and up to termination. Employees are not permitted to bring or consume marijuana, even when medically prescribed, on Company or Client property, even in states where use or possession of medical and/or recreational marijuana is legal.
0100.08	<p>City & State Addendum</p> <p>This section, which identifies rights and procedures applicable to Applicants and Employees who work in the cities and/or states listed below, is intended to supplement the Policy, as opposed to replace the Policy. However, to the extent any of the jurisdiction-specific provisions are inconsistent with the Policy, the jurisdiction-specific provisions will override any inconsistent provisions within the Policy.</p> <p style="text-align: center;"><u>Arizona</u></p> <p>Upon an Employee's request, the Company will provide written test results to the Employee. In addition, upon an Employee's request, the Company will allow the employee to explain a positive test result on a confidential basis.</p> <p style="text-align: center;"><u>Boulder, Colorado</u></p> <p>Employees have a right to obtain, immediately upon request, a copy of all records maintained of their initial positive confirmatory test results and must be provided the opportunity to submit written information explaining any such results. Employees will be notified of any other appeal procedure available in the event of an initial positive confirmatory test.</p> <p>A copy of Boulder's drug testing law can be found here: Ordinance No. 5688.</p> <p style="text-align: center;"><u>Iowa</u></p> <p>Any action taken against an Employee or Applicant under this Policy will be based only on the results of the drug or alcohol test or the failure to provide a sample. Employees and Applicants will be given the opportunity to provide any information relevant to the test, including identification of prescription or nonprescription drugs currently or recently used or other relevant medical information before a decision based on the test is made.</p> <p>The Company will consider an alcohol test to be positive if an Employee's blood alcohol concentration (BAC) is 0.02% or higher. Upon receipt of a confirmed positive alcohol test result, the Company will offer the Employee the opportunity to participate in and successfully complete a rehabilitation program in lieu of discipline if:</p> <ul style="list-style-type: none"> • The Employee has been employed by the Company for at least twelve (12) of the preceding eighteen (18) months; • The Employee has not previously violated this Policy; and • The Employee agrees to participate in rehabilitation.

Reference #	Standard
	<p>Rehabilitation may include participation in a substance abuse treatment program, employee assistance program (EAP), or other counseling or treatment program approved by the Company. To remain eligible for employment, the Employee must comply with all program requirements and any return-to-duty or follow-up testing protocols established by the Company. Failure to participate in, cooperate with, or successfully complete the rehabilitation program may result in disciplinary action, up to and including termination.</p> <p>The Company follows the Department of Transportation (“DOT”) guidelines and methods for breath alcohol testing. DOT testing methods can be performed under non-regulated drug testing programs, per Company policy. Screening is performed by a trained screening test technician or breath alcohol technician.</p> <p>Employees who exceed the screening threshold (0.02% breath alcohol) must undergo a confirmatory breath alcohol test using an evidentiary breath alcohol testing device. The confirmation test result is the final result for purposes of this Policy.</p> <p style="text-align: center;"><u>Minnesota</u></p> <p>Notification of test results</p> <p>Employees and Applicants will be notified within three (3) working days after the Company receives a negative or positive test result from the testing laboratory.</p> <p>If the test results are positive, in addition to the notification of their results, the Employee or Applicant will also receive a copy of their rights, including their right to contest the result and their right to request a confirmatory retest (at their expense) of the original sample within five (5) business days of their receipt of the positive test result. The notice will also inform the Applicant or Employee of the consequences of a positive result.</p> <p>Employees only: opportunity to seek treatment</p> <p>If an Employee tests positive for the first time while employed with the Company, the Employee will be offered an opportunity to participate in a drug and/or alcohol counseling or rehabilitation program, in lieu of termination of employment. The Employee must pay the costs of participating in a treatment plan, to the extent not covered by the Employee’s health insurance program. Employees who elect not to participate or who fail to complete a prescribed program, will be subject to discipline, up to termination. The option to pursue treatment in lieu of discipline extends only to Employees who test positive a first time, and does not include any Employee disciplined for other Policy violations, such as possession of prohibited substances at a Company or Client work site.</p> <p>Types of testing</p>

Reference #	Standard
	<p>Alcohol tests administered pursuant to this Policy may be conducted by using blood tests.</p> <p>Medical Marijuana If an Applicant or Employee tests positive for marijuana, and provides verification that they are enrolled the Minnesota state medical marijuana program, the Company will review that verification and will not take adverse action on the basis of the positive test result, unless it believes that the Employee used, possessed or was impaired by marijuana or marijuana products on Company or Client premises or during working hours.</p> <p style="text-align: center;"><u>Montana</u></p> <p>The Company will provide an Employee who has been tested with a copy of the test report. The Company will also obtain, if requested by an Employee, an additional test of the split sample by an independent laboratory selected by the Employee tested. The Company will pay for the additional tests if the additional test results are negative, and the Employee will pay for the additional tests if the additional test results are positive.</p> <p>Employees will also be provided the opportunity to rebut or explain the results of any test. The Company will consider an alcohol test to be positive if an employee's blood alcohol concentration (BAC) is 0.04% or higher.</p> <p style="text-align: center;"><u>New Jersey</u></p> <p>Medical Marijuana If an Applicant or Employee tests positive for marijuana and provides verification that they are enrolled in the New Jersey state medical marijuana program, the Company will review that verification and will not take adverse action on the basis of the positive test result, unless it believes that the Employee used, possessed or was impaired by marijuana or marijuana products on Company or Client premises or during working hours.</p> <p>Applicants and Employees have a right to dispute the results. They will be granted three working days after receipt of a notice that their results are pending Medical Review Officer (MRO) review to provide written notice that they have a legitimate medical explanation for the results to the MRO. The MRO will review their explanation and update the results, if necessary.</p> <p>If an Employee is in the possession of or using marijuana during work hours or on Company or Client premises, they are in violation of this Policy, and are subject to discipline, up to and including termination.</p> <p style="text-align: center;"><u>Rhode Island</u></p>

Reference #	Standard
	<p>Employees will be provided a reasonable opportunity to explain or rebut the results of any positive drug or alcohol test. Upon request, Employees will also be given the opportunity to have the original sample retested by an independent testing facility, at the Company's expense.</p> <p style="text-align: center;"><u>San Francisco, California</u></p> <p>Employees will be provided with a reasonable opportunity to rebut or explain a positive test result, but only if the sample provided by the Employee was either urine or blood.</p> <p style="text-align: center;"><u>Utah</u></p> <p>All drug or alcohol testing will occur during or immediately after the regular work period of Employees and shall be deemed work time for purposes of compensation and benefits for Employees. The Company will pay all testing-related costs, including the cost of transportation if the testing of an Employee is conducted at a place other than the workplace.</p> <p style="text-align: center;"><u>Vermont</u></p> <p>Please be advised that therapeutic levels of medically prescribed drugs tested will not be reported to the Company. Please also be advised that over-the-counter medications and other substances may result in a positive test.</p>

5.0 Related Documents

Reference #	Documents

6.0 References

- N/A

7.0 Exceptions

Requests for exceptions to this policy must be submitted to and approved by the Chief Operating Officer or designee.

8.0 Revision History

Revision #	Date	Reviewer	Description of Changes
1.0	04/09/25	Jeff Lynch	Draft of new policy

9.0 Approval

Approver name	Michael Flaim
Approver title	CFO
Approver signature	
Date	8/25/2025