

Maritime Helicopters, Inc.

DRUG AND ALCOHOL POLICY

EFFECTIVE 6/12/2020

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PROGRAM GUIDELINES

Purpose

Maritime Helicopters, Inc. (MHI), hereinafter referred to as the “Company”, is dedicated to operating at the highest standards of safety. The purpose of this Drug and Alcohol Policy is to establish a program which ensures compliance with all Federal Aviation Administration (FAA) regulations, Company policies, and Client requirements.

Prohibitions

Personnel will be stood down from working for any Client following non-compliance with any of the prohibitions below:

- Unless specifically authorized in writing by the Client, while on Client premises, (including off-duty time) personnel are prohibited from using, possessing, selling, manufacturing, distributing, concealing, or transporting any of the following:
 - Any Prohibited Substance:
 - Marijuana in any form, even if legal in the local jurisdiction.
 - Potentially impairing medications (e.g. may be Prescription Drugs or over-the-counter medications or herbal medicines) used without a prescription or in a manner inconsistent with the prescription or directions for usage.
 - Alcohol – a consumable liquid containing ethanol (e.g. beer, wine, spirits) and powdered alcohol which can be reconstituted into an alcoholic drink.
 - Illicit drugs that are not or cannot be prescribed or mind-altering substance including all forms of naturally occurring and synthetic drugs e.g. synthetic cannabinoids, stimulants and hallucinogens that would inhibit the ability of personnel to perform work safely.
 - Contraband, consisting of:
 - Any drug or alcohol-related paraphernalia used or designed for use in testing, packaging, storing, injecting, ingesting, inhaling or otherwise introducing into the human body any Prohibited Substance.
 - Any paraphernalia or substance used or designed for use to dilute, substitute, or adulterate any alcohol or drug test specimen, or to otherwise obstruct the alcohol or drug testing process.
 - Firearms, ammunition, explosives, and weapons.
- Personnel are prohibited from switching or adulterating any urine, blood, or any other specimen, participating in any attempt to adulterate or substitute a specimen, obstructing the collection or testing process, failing to promptly proceed to a collection site and provide

specimens when told to do so, refusing to sign required forms, and failing to cooperate with an inspection.

- Personnel are prohibited from performing work for any Client while under the influence, including operating a vehicle on behalf of the Client.
- Personnel are prohibited from performing work for any Client if they have a confirmed positive alcohol test, an MRO confirmed positive drug test or refused testing in any test while employed by or being considered for employment by the Company.
- Personnel are prohibited from performing work for any Client if they refuse to submit to an inspection.

Program Management

- The Company's **Designated Employer Representative** (DER) is Jessica DelRosario. The DER has oversight of the Company's Drug and Alcohol program and is authorized by the Company to receive test results and make required decisions regarding test results.
- The Company provides training to company supervisors on random testing notification procedures, post incident testing procedures, and reasonable suspicion testing procedures.
- The Company provides training to company supervisors and the DER to ensure they are familiar with the Stand Down and Disqualified Personnel requirements of Clients.
 - o **Stand Down**: requires immediate removal of Company personnel from working for Clients.
 - o **Disqualified Personnel**: disqualified from working for Clients if they fail to meet or comply with, or in any way violate the requirements established in the agreement with the Client.
- All Company personnel are expected to follow any Client- or jobsite-specific requirements as well as any local legal requirement applicable to alcohol and drug testing.

Education

The Company requires employee education on the Drug and Alcohol Policy and DOT drug testing requirements. This training is provided online through the ThinkHR platform and covers health risks caused by substance abuse and how to recognize employees with potential substance abuse problems.

See Form Attachment 1 for a Supervisor Drug and/or Alcohol Checklist.

An employee who voluntarily seeks help for an alcohol or drug problem, prior to violating this policy, may, at the sole discretion of the company, be allowed to continue employment while under a medical professional's care. Employees may access the Company's Employee Assistance Program to seek treatment. Contact Human Resources for information on this benefit.

Inspections

At any time on Client premises, the Client may conduct or require company to conduct, an unannounced inspection of Company personnel and their property for items that may include prohibited substances or contraband. Inspections may include, but are not limited to:

- Clothing
- Wallets
- Purses
- Baggage
- Lockers
- Work areas
- Desks
- Toolboxes
- Vehicles

The Client or Company may authorize inspection specialists, including scent-trained animals to conduct an inspection.

Medication Disclosure

Company personnel working for Clients in Safety Sensitive positions may only use potentially impairing medication (e.g. prescription drug, over-the-counter medication, herbal medicine) under the following conditions:

- Medication(s) have been obtained in a manner consistent with applicable laws and regulations.
- Company personnel have notified company that they will be in possession of, or using, potentially impairing medication(s).
- Company's health professional has assessed the capability or fitness of personnel to perform the safety sensitive duties.

Disqualified Personnel

Company personnel are disqualified from working for any Client if they fail to meet or comply with, or in any way violate, the requirements established within the agreement by the Client.

- Company shall immediately notify Client when Company personnel are disqualified from performing services for the Client.

- Company shall immediately, or as soon as practicable, remove Company personnel from Client premises.
- Company will not assign or reassign Disqualified Personnel to perform services at any Client premises in the future.
- At Client's request company shall verify the quality of all services in which the Disqualified personnel may have participated, and submit a written report to Client that documents the verification, any findings, and the actions taken to assure all deficiencies have been corrected.

Testing Requirements

Pre-enrollment Testing: Safety Sensitive personnel must be admitted to the Random Pool prior to commencing services on Client premises.

A pre-enrollment drug and alcohol test is required for entry into the Random Pool unless:

- A negative result was obtained from any category of test (e.g. pre-employment, random, post-incident, reasonable suspicion) using a drug test panel that meets or exceeds the requirements of the Client within the 6 months before admission the Random Pool, or,
- Company personnel are currently enrolled in a random testing program that complies with the requirements currently established by the Client.

Post-Incident Testing:

- If the performance of Company personnel contributed to an incident or cannot be completely discounted as a contributing factor to the incident, the Company shall immediately Stand Down company personnel.
- Alcohol and Drug testing must be completed as soon as possible after the decision to test. If specimen collection is not completed within 2 hours, the reason for delay must be documented. The Client may request to review reasons for delay and decide if they are acceptable.
- For purposes of this guideline, "incident" includes, but is not limited to, an actual event that caused, or had potential to cause, significant safety, environmental, or property damage incidents such as:
 - Medical treatment beyond first aid, or
 - Reportable environmental release, or
 - Disabling damage to a vehicle, or
 - Significant property damage

Reasonable Suspicion Testing:

- Reasonable suspicion testing is conducted when there is suspicion of specific Company personnel being under the influence.
- Company shall immediately Stand Down the personnel.
- Alcohol and Drug testing must be completed as soon as possible after the decision to test. If specimen collection is not completed within 2 hours, the reason for delay must be documented. The Client may request to review reasons for delay and decide if they are acceptable.

Random Testing: Random testing program must include the following features:

- Generating random selections using a random number generator matched to a unique personal identifier. The Company will not pre-select personnel for testing.
- A random drug and alcohol testing rate of at least 50% of the total Random Pool per calendar year.
- Selection is the process of randomly choosing individuals from the Random Pool. There must be a minimum of 4 selections per year. Testing must be evenly dispersed throughout the year (i.e. quarterly at a minimum) and must not be predictable.
- If company personnel are not in the random pool when a random selection is made, they must complete another pre-enrollment test before being re-admitted to the random pool.
- Specimen collection must occur within 2 hours of notification to the company personnel of the need to be tested. Company personnel must proceed to testing immediately after being notified of a test requirement. The reason for any delay must be documented.
- If the person who normally announces tests is a member of the Random Pool, they must have no advance notice of their own test.

Company shall have a process in place to track the testing which would include, the number of drug and alcohol tests performed per quarter and the number of positive tests by each testing category (pre-access, reasonable cause, post-incident and random).

Company shall immediately Stand-Down the company personnel.

Alcohol and drug testing specimen collection must be completed as soon as possible after the decision to test. If specimen collection is not completed within 2 hours, the reason for delay must be documented. The Client may request to review the reasons for delay and decide if they are acceptable.

Government Regulated Positions

United States: In addition to government required testing (DOT), company personnel working U.S. government regulated positions and also classified as Safety Sensitive by a Client will be alcohol and drug tested for all test types and to the test panel required by The Client.

Returning Personnel to Services

- **Alcohol Testing:**
 - Following alcohol testing for any reason, company personnel whose alcohol screening test result is positive shall immediately Stand Down
 - If Confirmation Test is negative personnel must not return to services until 8 hours have elapsed.
- **Reasonable Suspicion / Post Incident:** Clients will consider request for company personnel to return to services only after negative alcohol and negative drug test results have been received and documented.
- **Group Suspicion-based Testing:** Clients may consider Company personnel to return to perform “low exposure” services while awaiting alcohol and drug test results. The Client will consider Company request for personnel to return to Safety Sensitive services only after negative alcohol and negative drug test results have been confirmed by company management and communicated to the Client.
- **Fitness for Work:** After a fitness for work concern is identified, and before Company can return personnel to services, Company’s health professional must evaluate the Company personnel, clear them to return to work, define restrictions if applicable, and document the conclusion. A fitness for work concern may be identified from such events as:
 - MRO review of a laboratory positive test result may lead to a MRO negative determination, but the MRO may identify a fitness for work concern.
 - A required medication disclosure by those in Safety Sensitive positions or the admission of possession or use of a potentially impairing substance by those in Low Exposure positions.

Medical Review Officer (MRO)

The Company’s **Medical Review Officer** (MRO) is David Nahin.

David Nahin
Quest Diagnostic
9501 Northfield Blvd
Denver, CO 80238

MRO Qualifications:

1. Must be a physician with a license and/or certification to practice medicine, prescribe medications, and diagnose and treat medical conditions.
2. Must have a working knowledge of workplace drug testing, drug pharmacology and pharmacokinetics.
3. Have participated in a formal educational program pertinent to workplace drug testing.

Company or their agents must, at a minimum, require an MRO review for:

- All non-Negative laboratory results, including:
 - o Laboratory positive results for drug(s) metabolite(s)
 - o Adulterated or substituted specimen
 - o Laboratory invalid result
- Alleged inability to provide a specimen

Laboratory Certification/Accreditation

Laboratory must be accredited to either: College of American Pathologists Forensic Drug Testing or National Laboratory Certification Program.

Drug Testing Requirements

Screening Test must be performed using an appropriate and validated technique. Positive Screening Test must be confirmed using a laboratory chromatographic technique in combination with mass spectrometry. Validity testing must be performed and reported on every urine specimen.

Alcohol Testing

Approved Alcohol Test Methods: Alcohol screening test shall be performed by either breath or oral fluid. Alcohol confirmation test shall be performed by either breath (EBT) or blood.

Alcohol Screening Test Devices: Alcohol screening test devices must be:

- Listed on the U.S. National Highway Traffic Safety Administration Conforming Products List of alcohol screening devices (ASD), or
- Certified by the U.S. Food and Drug Administration with a minimum cutoff of 0.020 g/dl or
- European CE marked, with a minimum cutoff of 0.020 g/dl or
- Any device that is approved for confirmation breath testing can be used for screening breath testing.

Alcohol Screening Cut-off Level: 0.02 (blood alcohol content BAC or its equivalent)

Alcohol Confirmation Breath Testing Device must be approved by:

- Listed on U.S. National Highway Traffic Safety Administration Conforming Products List for Evidential Breath Testing Devices, or
- European Norm EN 15964, or
- UK Home Office for Breath Alcohol Screening Devices, or

- Canadian Alcohol Test Committee Approved Screening Devices.
 1. Must provide a printed test result
 2. Must assign a unique number to each test
 3. Must print the instrument name, the serial number, and time of the test on the printout
 4. Must perform and pass a blank test prior to all subject tests.

Alcohol Confirmation Cut-off Level: 0.04 (blood alcohol content BAC or its equivalent)

Alcohol Testing Technicians: Only alcohol testing technicians or collectors that meet the requirements can perform alcohol testing. Alcohol technician or collectors must:

- Be trained according to manufacturer's instruction on any devices used.
- Maintain documentation of training and demonstrate competency.
- For confirmation alcohol blood collections, a collector must be a trained phlebotomist or healthcare professional and trained in the completion of a CCF (Custody and Control Form).

Drug Specimen Collection

Collector Requirements: A collector must be trained in all steps necessary to complete a collection correctly and the proper completion and transmission of the CCF, including:

- Steps to complete the CCF
- Collection procedure and urine collection kit
- Instructions for unusual collections (e.g. sky bladder)
- Collection site preparation
- Contractor personnel Identification
- Fatal Flaw
- Contractor personnel privacy
- Specimen handling and storage
- Packaging of specimens to be shipped to the laboratory

A collector must maintain documentation of training and demonstrated competency.

Collection Site: For urine collections, the collection site should be a private area with toilet facilities. In the event a private facility is not available, the Collector should perform the urine collection in the area that will provide the company personnel as much privacy as practicable. The toilet facilities shall be free of all possible additives and adulterants (e.g. running water, soap, and cleaning agents).

Approved Alcohol and Drug Test Matrices

Test Matrix	Screening Test	Confirmation Test
Alcohol		
Blood	Not Approved	Approved
Breath	Approved	Approved (EBT)
Oral Fluid	Approved	Not approved
Urine	Not approved	Not approved
Drug		
Blood	Not Approved	Not Approved
Hair	Not Approved	Not Approved
Oral Fluid	Not Approved	Not Approved
Urine	Approved	Approved

Record-Keeping

Company will be required to retain documents that support compliance with Client's requirements for the current calendar year plus the previous three calendar years and have them readily available for review. The last records can be discarded 3 years after termination or expiration of the agreement.

The following is an example of documentation that should be retained by the Company and made accessible upon request by a Client and its authorized agents, assigns, and representatives:

- Designated Employee Representative contact information
- Record of supervisors' training in:
 - Random testing
 - Post incident testing
 - Reasonable suspicion testing
 - Stand down procedures
- TPA contact info (if used)
- MRO(s) name/contact info
- List of collection sites
- Records of personnel training in drug specimen collections

- Laboratory contact information
- Number of Safety Sensitive personnel, number of random tests, random testing percentage rate achieved each quarter, etc.
- List of all company personnel in random pool (names and unique identification numbers).
- Records to demonstrate that all Safety Sensitive personnel in random pool have been tested at least once in last 2 calendar year period.
 - Note: if Company personnel have not been tested at least once in the 2 calendar years, company must provide reason for the non-test.
- Dates of the following:
 - Reasonable suspicion testing
 - Post incident testing
 - Group suspicion-based testing
 - Contraband inspections
 - Accuracy check log, calibration records, and manufacture's certification for EBT
- Records of drug and alcohol test results
- Records to demonstrate compliance of subcontractors
- Written procedure for ensuring Company personnel who are disqualified from providing services to the Client continue to be excluded from their locations

Sub-Contractors

Upon request of a Client, the Company shall provide documentation supporting compliance of Client requirements by subcontractors performing services to the Client.

Applicable Laws

Company shall comply with all applicable Federal, State and local drug and alcohol related laws and regulations.

ADDENDUM A: ExxonMobil Requirements

Purpose

This addendum addresses ExxonMobil-specific requirements identified in the agreement (Exhibit H) between the Company and ExxonMobil.

ExxonMobil Testing Requirements

- Company personnel, who have not been tested to the required testing for any reason in a two calendar year period, must be selected for an unannounced test before the end of the second calendar year. ****Example: individual entered Random Pool in August of year 1, and was not randomly selected in year 1 or year 2. Individual must be selected and an unannounced test completed before the end of year 2.*
- Statistical data will be required every 6 months on ExxonMobil's random program.

Group Random Testing: Company personnel on ExxonMobil premises are subject to unannounced random selection for testing by group (e.g. skill/trade, location, vehicle/vessel, or shift) for Drugs and Alcohol. This type of testing can be initiated by MHI or by ExxonMobil.

- Company must maintain and generate Group Random selections using a scientifically valid method (e.g. random number generator) matched to a unique group identifier.
- Each group must participate in each Group Random selection, even if the group has been previously randomly selected for testing.
- Company personnel selected for Group Random testing can be counted towards the 50% annual random testing rate for the Safety Sensitive personnel.

Group Suspicion-based Testing: Group Suspicion-based testing of Company personnel may be required without notice on ExxonMobil premises, based on evidence of prohibited substances or contraband on ExxonMobil premises that cannot be identified to a specific individual. Group Suspicion-based testing must be limited to the likely affected work group or work area.

The following is ExxonMobil's minimum Drug testing panel for all test reasons. All individuals, who would be required to test, should be tested using a drug test panel that meets or exceeds the following.

Specimen Validity Testing (SVT):

The following validity tests must be performed and reported on every urine specimen.

- pH
- oxidizing adulterants (e.g. nitrites, chromium VI)
- creatinine

- specific gravity when the creatinine is <20 mg/dl or 2.0 mmol/L (depending on the standard the chosen laboratory uses)

SUBSTANCE	SCREENING CUT-OFF LEVEL (ng/ml)	CONFIRMATION CUT-OFF LEVEL (ng/ml)
AMPHETAMINES	500	
AMPHETAMINE		250
METHAMPHETAMINE		250
MDMA		250
MDA		250
MDEA		250
BARBITURATES	300	
AMOBARBITAL		200
BUTALBITAL		200
PENTOBARBITAL		200
PHENOBARBITAL		200
SECOBARBITAL		200
BENZODIAZEPINES	300	
ALPRAZOLAM METABOLITES		100
NORDIAZEPAM		100
OXAZEPAM		100
TEMAZEPAM		100
FLURAZEPAM METABOLITES		100
LORAZEPAM		100

TRIAZOLAM METABOLITES		100
COCAINE METABOLITES	150	
BENZOYLECGONINE		100
MARIJUANA METABOLITES	20	
THCA (11-nor delta-9THCA)		10
METHADONE	300	200
OPIATES	300	
MORPHINE		100
CODEINE		100
HYDROMORPHONE		100
HYDROCODONE		100
6-ACETYLMORPHINE (6-AM)	10	10
OXYCODONES	100	
OXYMORPHONE		100
OXYCODONE		100
SYNTHETIC CANNABINOIDS – U.S. ONLY		
PARENT COMPOUND	REQUIRED URINE TESTING METABOLITE	MAX SCREENING and CONFIRMATION CUT-OFF LEVELS (ng/ml)
JWH-018/AM-2201	JWH-018 N-pentanoic acid	2.0 to 5/31/2016 0.2 screen and confirmation 6/1/2016 and beyond
JWH-073	JWH-073 N-butanoic acid	2.0 to 5/31/2016 0.2 screen and confirmation 6/1/2016 and beyond
UR-144/XLR-11	UR-144 N- pentanoic acid	4.0 to 5/31/2016 0.5 screen and confirmation 6/1/2016 and beyond

AKB-48-(APINACA)	AKB48 N-pentanoic acid	2.5	
BB-22	BB-22-3-carboxyindole	5	
PB-22-(CUPIC)	PB-22-3-carboxyindole	5	
5-FLUORO-PB-22- (5F-PB-22)	5-FLURO PB-22-3-carboxyindole	5	
AB-FUBINACA	AB-FUBINACA oxobutanoic acid	2.5	
ADB-PINACA	ADB-PINACA N-pentanoic acid	5	
AB CHMINACA	AB CHIMINACA 3- methyl- butanoic acid ("M2")	2.5	
AB PINACA/5-F-AB-PINACA	AB PINACA N-pentanoic acid	5	
ADBICA	ADBICA N-pentanoic acid	5	

FORMS

Attachment 1: SUPERVISOR DRUG AND/OR ALCOHOL CHECKLIST

Supervisor Drug and/or Alcohol Checklist		
Question	Yes	No
Smell of alcohol on breath of person?	☐	☐
Speech:		
Slurred?	☐	☐
Confused?	☐	☐
Fragmented?	☐	☐
Slow?	☐	☐
Unusually soft?	☐	☐
Unusually loud?	☐	☐
Disorientation – Is the contractor confused about:		
Where he or she is?	☐	☐
What day it is?	☐	☐
What time it is?	☐	☐
Apparent inability to focus on work?	☐	☐
Unusual or unexplained resistance to authority or refusal to follow reasonable directions?	☐	☐
Lack of motor coordination?	☐	☐
Mood:		
Belligerent?	☐	☐
Moody?	☐	☐
Ecstatic?	☐	☐
More nervous than usual?	☐	☐

Supervisor Drug and/or Alcohol Checklist

Question	Yes	No
Giddy?	☐	☐
Talkative?	☐	☐
Drowsy?	☐	☐
Skin color:		
Pale?	☐	☐
Flushed?	☐	☐
Excessive perspiration?	☐	☐
Excessive trips to the restroom?	☐	☐
Bloodshot eyes?	☐	☐
Dilated pupils?	☐	☐
Pinpoint pupils?	☐	☐
Traces of alcohol in containers?	☐	☐
Confession by contractor that he/she was drinking alcohol or ingesting drugs?	☐	☐
Confirmation by other contractors or employees?	☐	☐
Presence of substances with the appearance of drugs?	☐	☐
Presence of drug paraphernalia?	☐	☐
Smell of marijuana?	☐	☐
Congregation of contractors in remote areas of the companies, facilities, or in areas not usually frequented by contractors?	☐	☐
Weariness, fatigue, or exhaustion?	☐	☐
Deteriorating physical appearance?	☐	☐
Yawning excessively?	☐	☐

Supervisor Drug and/or Alcohol Checklist

Question	Yes	No
Blank stare or expression?	☐	☐
Sudden and/or unpredictable change in energy level?	☐	☐
Unusually energetic?	☐	☐
Shaking or trembling of hands?	☐	☐
Sunglasses worn at inappropriate times?	☐	☐
Changes in appearance after lunch break?	☐	☐
Withdrawal and avoidance of peers?	☐	☐
Complaints from co-workers?	☐	☐
Excessive absenteeism, especially Mondays, Fridays and days before or after holidays or paydays?	☐	☐
Unusually high incidence of colds, flu, upset stomach, and/or headaches?	☐	☐
Unauthorized or unscheduled absences?	☐	☐
Breathing or swallowing difficulties?	☐	☐
Unusual sneezing / nasal congestion?	☐	☐
Needle marks on arms?	☐	☐
Prolonged lunch hours?	☐	☐
Tardiness?	☐	☐
Unexplained departures from work or disappearances from the job area?	☐	☐
More than average number of job-related mistakes injuries or accidents?	☐	☐
Decrease in efficiency or productivity?	☐	☐
Careless operation of equipment?	☐	☐
Careless performance of job?	☐	☐

Attachment 2: DRUG AND ALCOHOL TEST RELEASE AUTHORIZATION

Drug and Alcohol Test Release

Authorization:

I hereby acknowledge that I have been provided a copy of Maritime Helicopters' Employee Handbook and Drug and Alcohol Policy. I understand that disciplinary action up to and including termination will result if I violate this policy.

I authorize and consent to disclosure by Maritime Helicopters, Inc. and its agents, including, but not limited to, any collecting agencies, of the recent drug and alcohol test results and any related information to customers of Maritime Helicopters and its authorized agents, assigns, and representatives.

Signature

Date

Print Name