JOE JOHNSON EQUIPMENT
A subsidiary of Federal Signal Corporation

Policy & Procedure: USP113

Subject: Alcohol and Substance Use

PURPOSE
To maintain a healthy and safe environment for all employees of Joe Johnson Equipment LLC.

SCOPE
This policy is applicable to all employees of Joe Johnson Equipment LLC.

DEFINITIONS (for the purpose of this policy)
The "Company" - Joe Johnson Equipment LLC, may be represented as "JJE", "JJEI"," Joe Johnson Equipment", "the Business" or the "Company" at various times throughout this policy manual.
An "Employee" - Joe Johnson Equipment LLC may refer to an employee as "the employee", "employees", "staff", "team members" or specified position within Joe Johnson Equipment at various times throughout this policy manual.

POLICY
Joe Johnson Equipment LLC maintains a workplace that is free from the effects of alcohol and substance abuse. This Alcohol and Substance Abuse Policy is designed to help prevent accidents and injuries resulting from the misuse of alcohol or use of controlled substances by Company employees. Our employees deserve a workplace that is safe and free from the dangers of drug and alcohol induced behaviors.

Zero tolerance: A drug and alcohol free workplace is an essential component to a quality work environment. The Company has implemented a zero tolerance rule towards the use of alcohol and illegal substances during work hours and therefore, prohibits the use of illegal drugs, alcohol and/or any other substances during work hours.

Definition
For the purposes of this zero tolerance rule, an alcoholic beverage is any beverage that may be legally sold and consumed and has alcohol content.

- Substance is defined as any substance other than alcohol capable of altering an individual's mood, perception, pain level, or judgment.
- A prescribed drug is any substance prescribed for individual consumption by a licensed medical practitioner.
- An illegal drug is any drug or controlled substance that is illegally sold orconsumed.

Requirements
All employees are prohibited from being under the influence of alcohol or drugs (illegal or prescription), that may inhibit their co-ordination or reflex action during work hours.

Employees are prohibited from the illegal use, sale, dispensing, distribution, possession, or manufacture of illegal drugs, controlled substances, narcotics, or alcoholic beverages on Company premises or work sites. In addition, the Company prohibits off-premises abuse of alcohol and controlled substances, as well

as the possession, use, or sale of illegal drugs, when these activities adversely affect job performance, job safety, or the Company's reputation in the community.

No prescription drugs will be brought on company premises by any person other than the one for whom it is prescribed. Such drugs will be used only in the manner, combination, and quantity prescribed. Any employee whose off-duty abuse of alcohol, illegal or prescription drugs results in excessive absenteeism, tardiness, poor behavior, or is the cause of an accident is not acceptable and discipline will apply.

No alcoholic beverage will be brought or consumed on company premises or during working hours, except in connection with company-authorized events.

Any employee who commits an unlawful act on or off company premises, such as: the use or sale, possession, transfer, or purchase of illegal drugs on company property or while performing company business is strictly prohibited and will be reported to appropriate law enforcement officials. Additional prohibited conduct includes:

- Refusing to submit to a post-accident, random, reasonable suspicion or follow-up alcohol or controlled substances test.

- Reporting for duty or remaining on duty requiring the performance of safety-sensitive functions when the employee uses any controlled substance, except when the use is pursuant to the instructions of a licensed medical practitioner who has advised the employee that the substance will not adversely affect the employee's ability to safely perform their job.

- Reporting for duty, remaining on duty or performing a safety-sensitive function, if the employee tests positive for illegal substances.

While we do not wish to intrude into the private lives of our employees, we recognize that involvement with drugs or alcohol abuse off the job could affect job performance and can negatively affect the Company's credibility and reputation.

- If an employee has an off duty involvement with drugs which raises a question of the employee's fitness for duty, he or she will not be permitted to return to work or will be temporarily placed in a no-safety sensitive position until the situation is investigated.

- An employee who drives a vehicle in the course of their employment must report a suspension or revocation of driving privileges as a result of an alcohol related incident to Human Resources.

Employee Responsibility

An employee, who knowingly allows anyone under their responsibility to violate this policy and allows anyone to work while under the influence of alcohol or drugs, or to work while otherwise unfit for duty, will be subject to disciplinary action.

Any employee who has knowledge of a violation of this policy must report that violation Human Resources. If an employee participates in any conduct and discredits the company in any way, they will be subject to disciplinary action.

Inspections
Employees, their possessions, containers under their control and Company-issued equipment are subject to search and surveillance at all times while on Company premises or work sites or while conducting Company business if there is a reasonable suspicion that there may be a violation of the Company's Alcohol and Substance Abuse Policy.

Any suspected or known illegal drug activity will be reported to the appropriate law enforcement agencies and cooperation will be given to them in the course of their investigations. Any confiscated drugs will be given to the proper law enforcement agency.

Prescription and over-the-counter Medication
Any employee in a position affecting public safety (for example, employees who operate motor vehicles or heavy equipment) must report to management if they are using medications which may affect their ability to perform essential functions of their job and thereby result in a direct threat to public safety. Failure to do so will result in disciplinary action up to and including termination.

Testing
As part of the Company's Alcohol and Substances Abuse Policy and to facilitate any investigation regarding unauthorized drug use or alcohol abuse, employees will be subject to drug and alcohol tests. In establishing and administering the drug and alcohol-testing program, the Company will make every effort to safeguard the privacy interests of its employees.

Reasonable Suspicion Testing
Employees could be required to submit to a drug and alcohol test if their performance, behavior, or other evidence indicates that they may be unfit for duty and may be using illegal drugs or abusing alcohol. Examples of situations under which this type of test could be required due to reasonable suspicion include but are not limited to:

- Unusual or aberrant behavior
- Declining or erratic work performance
- Excessive absenteeism or tardiness
- Possession, sale, manufacture, distribution or use of drugs or alcohol during working hours
- Accidents or incidents in which safety precautions were violated or unusual careless acts were performed
- Following an investigation based on receipt of credible information regarding an employee's abuse of drugs or alcohol
- Off duty involvement with illegal drugs or abuse of alcohol as previously described
- Any employee who reports to work and based on the observation of at least two responsible individuals appears to be under the influence of alcohol or an unauthorized drug, will be asked to leave the premises. If necessary, a family member will be contacted to escort the employee home or a taxicab will be provided to ensure the safe transportation of the employee.
- Prior to the employee being escorted home, he or she will be directed to take an immediate alcohol and drug-screening test to determine if unauthorized drugs or alcohol were the cause of the problem, or if another medical problem may exist.

Post-Accident Testing

Any employee who is involved in an on-the-job accident may be directed to take a drug and alcohol-screening test before returning to work if, in the view of management, drugs and/or alcohol may have been a contributing factor. This policy applies to accidents whether or not injury or loss of property occurs. Drug and alcohol testing may be required when an employee's actions cause any accident, which results in personal injury requiring medical care or damage to property.

All surviving drivers will be tested for alcohol and illegal substances as soon as practicable following an on-the-job occurrence involving a motor vehicle operating on a public road. An employee subject to post-accident testing shall remain readily available for testing or will be deemed by the employer to have refused to submit to testing.

An employee who is required to participate in a drug or alcohol rehabilitation program will be scheduled for follow-up unannounced drug and alcohol tests after returning to work.

Employees may be required to take an unannounced drug and alcohol test if such a test is deemed necessary to assist management in the investigation of suspected illegal drug use within the Company.

Drug and Alcohol Testing Process

Employees will be tested for the presence of drugs by collecting a urine specimen or through the use of other appropriate methods. The specimens are tested at a laboratory licensed by the State and certified by the Substance Abuse and Mental Health Services Administration (SAMHSA) of the U.S. Department of Health and Human Services.

The test for alcohol involves the use of an evidentiary breath-testing instrument. If the test result is positive, the employee may request a blood sample be taken to confirm the presence of alcohol.

For a positive drug test or a test for alcohol involving a blood sample, a licensed physician designated as the Company's Medical Review Officer (MRO) will review the results of the laboratory test and applicable records. The MRO will provide the employee with an opportunity to discuss the findings prior to the confirmation of a positive drug or blood alcohol test and prior to notification of the result to any designated company employee.

To facilitate employee and public safety, the MRO may temporarily remove an employee from a safety sensitive position pending completion of the review.

All drug and alcohol test results will be maintained by management as part of an employee's medical record and will be treated with the strictest confidence. Information regarding test results will not be divulged without first advising the employee and such information and will only be communicated on a need-to-know basis.

Management Action and Disciplinary Process

Illegal Drug Involvement

Following an investigation by the Company, an employee who is determined to have been involved in the possession, sale, manufacture, distribution or use of illegal drugs during working hours, on company property or at a work site will be terminated.

Positive Test Result for Illegal Drugs

An employee, who for the first time tests positive for an illegal drug, as confirmed by the MRO, will be suspended for up to five (5) days without pay and will be required to seek assistance or counseling.

The employee must have a return to work drug test with negative test results prior to returning to work.

The employee may be subject to unannounced drug testing for a minimum period of one year.

A second confirmed positive test for illegal drugs will result in immediate termination.

Positive Test Result for Alcohol
An alcohol test below .02 BAC will be considered a negative test; results above that limit will be considered positive.

If a confirmatory blood test is administered, any level of alcohol found in the bloodwill confirm the breath alcohol test as positive under the direction of the MRO.

The following actions will be taken for a positive alcohol test.

- ♦ All positive test results will be handled on a case-by-case basis. Therefore, at a minimum the following disciplinary actions apply:

- First Occurrence – the employee will be suspended for five days without pay and will be required to seek assistance/counseling.
- Second Occurrence – the employee will be immediately terminated.

Subverting the Drug Testing Process
If a specimen is identified as being a substitute specimen or adulterated to change the outcome of the drug test result, the test will be considered a refusal to test.

Drug and Alcohol Test Refusal
A refusal to provide for a drug and/or alcohol test, failure to appear for a scheduled test when notified, subverting the drug testing process, or any other behavior which compromises the integrity of the testing program or process will result in discipline up to and including termination.
Appeal Process:
An employee may appeal a confirmed positive drug test within 72 hours of being notified by the MRO. The appeal is a reanalysis of the employee's original urine specimen, which will be conducted by the original laboratory or by another certified laboratory. The employee will be responsible for the cost of this reanalysis.

The employee's request for reanalysis does not alter action associated with a confirmed positive test unless or until such test results are deemed to have been incorrect. The employee is responsible for requesting an appeal directly from the MRO.

Drug and Alcohol Rehabilitation:
As the purpose of the drug and alcohol-testing program is to promote health and safety, the Company encourages employees to get assistance in resolving any personal problems that may arise. An employee who voluntarily requests assistance in resolving a drug or alcohol abuse problem will be encouraged to participate in an assistance/counseling program.

Participation in an assistance/counseling program does not relieve the employee from job expectation requirements.

Participation will not jeopardize the employee's job provided the employee stops all involvement with illegal drug and/or alcohol abuse and maintains satisfactory work performance.

After successful completion of the counseling program, the employee may be subject to an unannounced drug and alcohol-testing program.

A subsequent confirmed positive drug and/or alcohol test will result in further disciplinary actions, up to and including termination.

The employee will remain subject to disciplinary actions for previous violations of company policies.

The cost of the counseling/rehabilitation program will be the responsibility of the employee.