

HEALTH CARE SERVICE CORPORATON

POLICY

DEPARTMENT: Corporate Protection and Security	
POLICY NUMBER: PS.06	POLICY TITLE: Alcohol and Drug Free Workplace Policy
EXECUTIVE OWNER: Leader, Corporate Real Estate and Development	BUSINESS OWNER: Business Area Subject Matter Expert of Alcohol and Drug Free Workplace Policy
ORIGINAL EFFECTIVE DATE (IF KNOWN):	COMMITTEE APPROVAL DATE: 12/11/2025

I. SCOPE

This Policy applies to all individuals engaged in any Health Care Service Corporation, a Mutual Legal Reserve Company (HCSC) work as employees (full-time, part-time, temporary, or seasonal) and contingent workers (staff augmentation and independent contractors) ("Workers"), as defined in the HCSC HR Workforce Classifications Policy.

II. PURPOSE

HCSC is committed to providing a secure and safe environment for all personnel who work at or visit its properties. HCSC established the Corporate Protection and Security Department to identify and mitigate risks to all affiliated personnel, including the HCSC Board of Directors and senior executives.

III. POLICY

HCSC recognizes that drug abuse and alcohol dependency are national social and health problems that have devastating consequences to individuals and their friends and families.

HCSC has adopted the following policy that balances our respect for individuals and fosters a drug-free, healthful, and safe work environment.

- This policy recognizes that Worker involvement with alcohol, marijuana, and other drugs can be very disruptive and adversely affect the quality of work, including the ability to deliver consistently excellent client service in a professional manner. Also, it may pose serious health risks to users and others, and have a negative impact on productivity and morale.
- HCSC also believes Workers not complying with this policy may, in the judgment of HCSC, threaten the reputation or integrity of the Company.

Our *Alcohol Free & Drug-Free Workplace Policy* is intended to apply whenever anyone is representing or conducting business for HCSC. Therefore, this policy also applies while on HCSC's property and at HCSC authorized and/or sponsored events.

As a condition of employment, you must abide by the terms of this policy. In addition, you must report any conviction under a criminal drug or alcohol statute for violations occurring on or off HCSC premises while conducting HCSC's business. This report must be made to Employee Services within three (3) days following the conviction.

Drugs

In keeping with the policy, the use, possession, distribution, purchase, transfer, or any facilitation related to the use, possession, distribution, purchase, or transfer of illegal drugs and/or controlled substances is strictly prohibited. Employees are prohibited from performing work for HCSC while impaired by or under the influence of illegal drugs and/or controlled substances including, and in addition to, marijuana. Employees taking prescription drugs must do so in accordance with their physician's direction. In addition, employees must follow manufacturer's directions when taking over-the-counter drugs.

Alcohol

Workers may consume alcohol, in moderation, at HCSC-sponsored or HCSC authorized events, or during business-related meals or social occasions. In these circumstances, employees are required to act responsibly and to refrain from abusing alcohol or drinking in excess. Employees are HCSC's representatives, and their actions can directly affect HCSC's positive image and reputation among clients and in the community at-large. Employees must therefore limit the consumption of alcohol so as not to be intoxicated or pose a risk to the safety of themselves or others, and they must continually and consistently conduct themselves in a professional manner.

Driving Under the Influence

Please see *Protection and Security Policy PS.05, Driving*, for requirements related to the operation of a vehicle for Company business while under the influence of intoxicants, drugs, or alcohol.

Reasonable Suspicion

It shall be a condition of employment for all employees to submit to substance abuse testing when there is reasonable suspicion to believe that an employee is under the influence of illegal drugs or alcohol or marijuana, and/or unauthorized controlled substances. The observable criteria, which may constitute reasonable suspicion include but are not limited to:

- Observed use or possession of alcohol, marijuana, or illegal drugs on Company premises or on the employee's person;
- Slurred speech;
- Smell of alcohol or marijuana;
- Physical loss of control, such as stumbling or violent behavior;
- Psychological loss of control, such as paranoia, rambling or incoherent speech, diminishing consciousness, or loss of touch with reality;
- Disruptive emotional stress, such as argumentative or unusually aggressive behavior;
- Detection of alcohol or illegal drugs on Company premises or on the employee's person;

- Unusual or repeated injury on the job or damage to property not readily explained by work conditions.

An employee's refusal to submit to the Company's drug or alcohol testing policies will subject the employee to disciplinary action up to and including termination of employment.

Consequences for Violating the Policy

HCSC has developed this policy to protect its employees, itself, and those with whom HCSC conducts business, from the negative impact of substance abuse. HCSC takes the issue of substance abuse very seriously. Therefore, violations of this policy will serve as the basis for disciplinary action, up to and including termination of employment.

Employee Assistance Program

HCSC encourages Workers to seek help voluntarily to further support their health and well-being. If you have a substance abuse issue and desire to overcome that issue, you may contact an EAP Consultant for assistance. Workers who undergo voluntary counseling or treatment and who continue to work are subject to the same job performance and behavior standards as other Workers. HCSC's support for treatment and rehabilitation does not obligate it to employ any person whose job performance is or remains impaired because of drug or alcohol use, even following a treatment or rehabilitation program.

IV. POLICY REVIEWERS

Person Responsible for Review	Title	Date of Review
Shane Colbert (Business Owner)	Executive Director, Corporate Protection and Security	11/17/2025

V. POLICY REVISION HISTORY

Description of Changes	Revision Date
Annual review, no updates	11/17/2025

VI. POLICY APPROVALS

Company, Division, Department, and/or Committee	By: Name	Title	Approval Date
Corporate Real Estate and Development	Jason Kaye	DSVP, Corporate Real Estate and Development	11/18/2025
CAS P&P Review Committee			12/11/2025