

**INTERNATIONAL PAPER  
SAFETY POLICIES AND PRACTICES  
STATEMENT OF INTENT**

**Contractor Safety  
Substance Abuse Program  
Date Prepared: August 25, 1998**

**Policy Language**

5.1.5 Qualified contractors shall have a documented substance abuse program that requires testing unless prohibited by law. A testing protocol should include pre-employment, random and reasonable cause testing.

**Policy Intent**

Qualified contractors must have an established substance abuse program that requires testing for the presence of illegal drugs and unauthorized controlled substances unless prohibited by state or local law. The contractor must not allow any applicant or employee testing positive for these substances to work on Company property.

An effective substance abuse program will include pre-employment, random and reasonable cause (or post accident) testing. During the qualification process, the contractor must provide, on request, written certification that all employees assigned to work on Company property are active participants of the substance abuse program. In addition, the contractor may be requested to provide written permission to the Company for access to all positive test results. Access must be provided in a manner that will not jeopardize the confidentiality of the tested person's test results.

Contractors with employees in low risk jobs, such as office support, cafeteria operations, and snack vending may be excluded from the pre-employment and random testing requirements. All exclusions should be approved by the facility contract coordinator and/or facility manager. Contractors granted this exclusion must maintain a program to perform reasonable cause testing.

Contractors that do not have an established substance abuse program or do not have a program that includes both pre-employment and random testing, must be required to test each employee assigned to work on Company property prior to beginning work. Typically this testing should be conducted as soon as practical to their start date at the company location allowing adequate time to obtain and review test results. Following this initial testing, the contractor must then initiate a program of random and reasonable cause testing for these employees as long as they are assigned to work on Company property.

Illegal drugs and unauthorized substances to be evaluated in a substance abuse program include amphetamines, benzoylcegonines, cannabinoids, opiates, and phencyclidine, and their metabolites. Specimen testing should include an initial screening test and a follow-up gas chromatography/mass spectroscopy confirmation test. In addition, alcohol may be evaluated for reasonable cause. *(International Paper does not routinely test for alcohol except in the federally mandated DOT program. Our primary evaluation for alcohol is based on documented behaviors. The only time analytical testing is encouraged is when an employee requests to be tested to prove there is no alcohol in his/her bodily system.)*

Reasonable cause (or post accident) testing for illegal drugs and controlled substances should be conducted if a contract employee is involved in an avoidable incident which caused or had the potential to cause injury to employee or others, or which caused significant property damage. The determination of whether damage was significant will be made by the local Company management and include consideration for the cost of repairs, value of manufacturing interruptions and product losses.

Random testing for illegal drugs and controlled substances should be administered by the contractor management and should be performed using a nondiscriminatory selection procedure. Typically, at least 25% of the employee population should be tested on an annual basis.