
SINCLAIR BROADCAST GROUP, INC. AND SUBSIDIARIES
EMPLOYEE HANDBOOK

...ment for these days may be withheld from the employee's last check in the event of termination of employment before completion of the introductory period. Completion of the introductory period does not entitle an employee to remain employed with the Company. Both the employee and Sinclair are free, at any time, with or without advance notice and with or without cause, to end the employment relationship for any reason at any time during or after completion of the introductory period.

Employees who transfer, are promoted, or are reassigned to other positions within the Company will not be required to serve any introductory time in the new position. However, at the discretion of the Department Head, if the position a current employee is changing to is substantially different from the one previously held (e.g., receptionist to sales assistant, or non-supervisory to supervisory), the change can be made conditional upon successful completion of a ninety (90) day trial period in the new position. At the completion or any time during the trial period, the employee may or may not be retained in the new position.

Public Relations

The success of our Company depends on maintaining a positive image and good communications with the public. Employees are expected to treat viewers, customers, and the general public in a respectful, courteous, and polite manner at all times. At times you may have to exercise considerable restraint, as the very nature of our business invites comment and criticism. It is not reasonable to believe that our audience or clients will always be pleased with our programming or services. In dealing with the public, all employees will do their utmost to remain cordial under all circumstances and maintain a spirit of helpfulness and consideration. Complaints and criticisms may be forwarded to your Department Head or General Manager.

Since clients and visitors may come into our stations at any time, it is also important that we keep the facilities clean, neat, attractive, and, above all, business-like. Maintaining this environment is a full-time responsibility of all employees.

Because we are so frequently in the public eye, employment with Sinclair creates the potential for making our personal lives subject to public scrutiny. The Company, therefore, must and does retain the prerogative to take employment action based upon employee conduct both during work time and outside the workplace if, in the Company's sole judgment and discretion, it creates the potential for a negative reflection on the Company.

Personal Appearance/Dress Code

The professional image of each station is enhanced by the appearance as well as the conduct of its employees. Dress, grooming, and personal cleanliness standards contribute to the morale of all employees and affect the image we present to customers and visitors. Each employee is expected to exercise good taste and should wear clothing acceptable for our business environment. Workplace attire and grooming must be neat, clean and appropriate for the work being performed and the setting in which the work is performed. Dress requirements will vary among different work groups and types of work. Therefore, please dress appropriately for the position, including adhering to any applicable safety standards. Consult your Department Head if you have any questions as to what constitutes appropriate attire. We hope that you will take pride in the Company and represent it and yourself in the most favorable manner, not only in the work place, but also at Company-related events and activities.

Changes in Status

Maintaining accurate and current information on employees is vital to the Company and ultimately beneficial for employees. If you change your address, home or cellular telephone number, name, marital status or emergency contact, be sure to notify the Company as soon as possible. Employees can make the necessary changes through Oracle in the Sinclair Employee Self-Service area on the intranet or by contacting Human Resources or Payroll.

Attendance and Tardiness

All employees are expected to report to work each day, on time as scheduled. When you must be absent for illness or other emergency, you are expected to contact your immediate Supervisor **directly** with as much advance notice as possible so arrangements can be made to cover your assigned area. Personnel wishing to take personal days or sick leave (when known) must give their Department Head at least two (2) working days notice.

Punctuality is essential to the efficient operation of any business. Employees are expected to report to work on time and be prepared to begin working at the beginning of their scheduled work hours. If you are going to be unavoidably detained and late for work, phone the station and advise your immediate Supervisor of your tardiness and expected time of arrival. Any work time missed may be deducted from gross pay, accounted for in an appropriate leave category, or made

Conduct of Employees

It is the policy of the Company that certain rules and regulations regarding employee behavior are necessary for the efficient operation of the Company and for the benefit and protection of the rights and safety of all.

1. Such conduct includes:

- A. Complying with all Company safety and health regulations and all personnel policies;
- B. complying with the spirit and letter of the Company's anti-discrimination policies;
- C. abiding by all Company policies with respect to smoking;
- D. wearing clothing deemed appropriate by the Company for the work being performed;
- E. performing assigned tasks efficiently and well;
- F. maintaining an orderly and clean work place and work area; and
- G. refraining from the use of alcoholic beverages or drugs, other than a drug prescribed by a physician taken consistent with the prescription or proper use of over the counter medication during working hours, including meal/break periods. This policy also includes within it the residual effects of alcohol and drugs where they may affect the employee's work performance and/or relationship with co-employees. If an employee has to take medication that may affect fitness for duty, the employee must promptly notify their supervisor and Human Resources Representative. The Company may request a doctor's statement be obtained by the employee which evaluates the medication with respect to its effect upon the employee's work performance.

2. Employees will not:

- A. Possess or use an illegal or controlled substance, other than a drug prescribed by a physician, or sell any such substance;
- B. engage in any conduct which could adversely affect the Company's public image or its mission;

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- C. carry or possess firearms, explosives, or any weapons on Company property or while in the performance of Company duties;
 - D. be insubordinate, disrespectful, or refuse to follow management's instructions concerning a job-related matter;
 - E. assault a fellow employee, visitor, or customer;
 - F. steal, unlawfully possess, misuse, or willfully damage the property of the Company, a client, or another employee's property or be negligent with such property;
 - G. gamble on Company property;
 - H. be dishonest, including, but not limited to, falsifying any Company record or report, such as an application for employment, a production record, sales order, program or operating log, an employee's time card, or shipping and receiving records;
 - I. be arrested for a criminal act which, in the Company's judgment, involves moral turpitude, as well as an arrest for a felony or theft;
 - J. fill out or alter another employee's time card or permit another employee to fill out or alter your time card;
 - K. record any aural communication without the express consent of all parties to the conversation;
 - L. engage in any harassing behavior with regard to sex, marital status, gender orientation, age, race, creed, religion, national origin, physical or mental disability, personal appearance, genetic information, veteran status, or any other characteristic protected by law;
 - M. engage in any act of violence, disorderly conduct, or use threatening or abusive language;
 - N. verbalize, publish, or distribute false or malicious statements concerning the Company, clients, managers, or any employee;
 - N. misuse disability or other insurance or benefit programs;
 - O. abuse Company time by loafing, sleeping, conducting personal business, or interfering with another employee's work performance;
 - P. solicit, promote, or distribute literature in support of any cause or organization during his or her working time or during the working time of the employee(s) to whom such activity is addressed; or
 - Q. violate any Company or building policy.

The above lists are illustrative of the types of behavior that is required and/or will not be permitted by an employee, and are not intended to be all-inclusive. Failure to adhere to and/or comply with the above requirements will subject the employee to disciplinary action, up to and including discharge.

Building Access and Visitors

practices, in accordance with the Sarbanes-Oxley Act. Employees utilizing the form for this purpose should know that those concerns directly bypass the Sinclair Corporate Office and route directly to a member of our Board.

Conflict of Interests

It is the policy of the Company to prohibit its employees from engaging in any activity or practice in conflict with the interests of the Company, its customers, or the people it serves. All employees must avoid any actual or potential conflict between their personal interests and the interests of the Company in dealing with fellow employees, other organizations, clients, or individuals seeking to do business with the Company. Situations should be avoided where it would be reasonable for an objective observer to believe that the judgment or loyalty of the employee may be adversely affected by his or her own, or a close family member's external relationship. This can include arrangements or circumstances which may influence an employee from acting in the best interests of the Company. Some examples of conflicts of interest which should always be avoided are as follows:

- A. No employee, or member of his/her immediate family, will accept a gift of more than a token value service, money, loan or any full-time, part-time, or temporary employment from any organization which does business with the Company, is seeking to do business with the Company, or is a competitor of the Company, unless authorized to do so by the Company.
- B. No employee or member of his/her immediate family may participate in any contest, drawing, or promotion sponsored by the Company solely or in association with its advertisers.
- C. An employee or members of his/her immediate family may not participate in any industry audience measurement study. Should you receive a diary or any request from a survey firm (e.g., Nielsen) to participate in an audience measurement study, please decline. Employees also may not influence, either directly or indirectly, a survey participant in his/her responses.
- D. Serving as a director, officer, partner, consultant, or in a managerial or technical capacity with an outside enterprise which does or is seeking to do business with or is a competitor of the Company.

The Company prohibits any employee from accepting or agreeing to accept from any entity, other than Sinclair, any money, service, or other valuable consideration in return for, or in connection with, the broadcast of any matter over the station.

Apart from this Company policy, Section 509(A) of the Communications Act requires any employee of a radio or television station who accepts or agrees to accept from any person (other than Sinclair) any money, service, or other valuable consideration in return for, or in connection with, the broadcast of any matter over a station, to disclose to the Company the fact of acceptance or agreement to accept. Section 509(A) also requires that this disclosure be made in advance of the broadcast in question. The purpose of this disclosure requirement is to enable the Company to determine whether a sponsorship identification announcement pursuant to Section 317 of the Communications Act is required to be broadcast as the consequence of an employee's acceptance or agreement to accept consideration for or in connection with the broadcast of any matter over the station.

In addition to any action which the Company may take, Section 508(G) of the Communications Act provides that any employee who fails to make the required disclosures shall, for each violation, be fined up to \$10,000 or imprisoned up to one year.

Outside employment must not conflict in any way with an employee's regular job with the Company. All employees will be subject to the Company's scheduling demands and performance expectations without regard to any impact from outside employment. The Company reserves the right to decide when outside activities conflict with job performance or Company interests, and may ask the employee to make changes or refrain from it.

In accordance with applicable SEC rules, the Company adheres to the Related Person Transaction Policy, which can be found on the intranet.

Any actions or conditions in conflict with the Company's interests will result in disciplinary action up to and including discharge. Employees who are uncertain as to conformity with Company policy should discuss such circumstances with their Department Head or immediate Supervisor.

Non-Disclosure/Confidential Nature of Company Affairs

As a publicly traded company, the Company is under statutory and other obligations to protect the confidentiality of its business affairs. It is the policy of the Company, therefore, that the business affairs of the Company should be discussed with no one outside the organization, except when required in the normal course of business and only to the extent necessary to perform the particular business.

The duties performed by you for the Company may place you in a position of trust and confidence with respect to certain trade secrets and other confidential and proprietary information relating to the conduct of the Company's business which is not generally known to the public. The protection of confidential information is essential to the interests and success of Sinclair. Such information includes, but is not limited to, price lists, personnel data, management discussions, considerations, and actions, advertising, marketing and promotional ideas and strategies, contest information, customer lists, financial or securities information, programming (including topics, content, development of program schedules, and the like), pending projects or proposals, rate cards, technological data, contracts, and research and development strategies. This provision is intended to protect confidential information of the Company which employees may possess and is not intended to, and does not, restrict any employee, as permitted by federal, state or local labor laws, from discussing his/her terms and conditions of employment with other employees or individuals.

An employee must not, while employed or thereafter, directly or indirectly:

- A. Disclose or furnish to any person, firm, agency, corporation, client, business, or enterprise, any confidential information acquired during employment with the Company, except as may be required by law or governmental process;
- B. individually or in conjunction with any other person, firm, agency, corporation, client, business, or enterprise, use or cause to be used any confidential information in any manner whatsoever, except in the furtherance of the business of the Company; or
- C. publish, deliver, or commit to such, any copies, disks, recordings, abstracts, or summaries of any files, records, conversations, documents, lists, proposals, or contracts, of confidential information, except to the extent required by the ordinary course of Company business.

All confidential information relating to the business of the Company, whether prepared by you or otherwise coming into your possession, will remain the exclusive property of the Company and you agree to return to the Company all such information, copies, or extracts immediately upon separating from the Company's employment or at any time the Company requests.¹

An employee's disclosure of confidential information is prohibited and will not be tolerated, whether or not the employee actually benefits from the disclosed information.

The Company has established procedures with respect to communications between Company personnel and financial analysts, securities brokers, members of the press and similar persons who may from time to time seek information from the Company as such information reflects on the business prospects of the Company. Such persons are referred to as "Analysts". Analysts may attempt to initiate communications by telephone or in writing and may indicate that they are writing a report or article or are generally interested in the Company. They may indicate that they are seeking to "verify" information from another source either inside or outside the Company. All such inquiries should be addressed substantially as follows: "All such questions are handled by our Investor Relations Department. Please call our Corporate office at 410-568-1500." If the Analyst persists, the employee should state substantially the following: "I am not at liberty to discuss Company information outside the Company", and then terminate the conversation. After any such conversation, please contact our Investor Relations Department and supply to them the name of the Analyst and describe the inquiry.

The Board of Directors of Sinclair has adopted a Code of Business Conduct and Ethics Code for *directors and employees* of the Company. This Code is intended to identify the ethical duties and responsibilities of *directors and employees*, provide guidance and assist them with ethical issues, provide mechanisms to report unethical conduct, and foster a culture of honesty and accountability. Each director and employee must comply with the letter and spirit of this Code.

Section 301 of the Sarbanes-Oxley Act requires the Audit Committee of the Board of Directors of Sinclair to also establish procedures for: (a) the receipt, retention, and treatment of complaints received by the Company regarding accounting internal accounting controls and auditing matters ("Accounting Matters"); and (b) the submission by employees of the Company, on a confidential and anonymous basis, of good faith concerns regarding questionable accounting or auditing matters. This procedure only applies to Accounting Matters. All other complaints should be directed through appropriate company channels.

A full copy of the Whistleblower Policy for Accounting, Internal Accounting Controls and Auditing Matters and Ethical Practices are presented upon employment and is also available in the Business Office and on the Company's intranet.

Travel Policy

Employees who travel in connection with their work must learn and observe the Company's Travel Policy. This Policy is available on the Company's intranet or may be obtained from the Business Office.

Telephones and Mail

The telephone is one of the most vital tools we have in our business. Our telephone system must be free from non-essential incoming and outgoing calls. It is the policy of the Company that its telephone facilities will be available during working hours for effective communication with the Company's customers, business associates, and members of the public. Accordingly, the use of Company facilities for personal calls should be avoided. In like manner, do not have personal mail (electronic or physical) delivered to the station or use Company stationery or mail systems for personal correspondence.

COMPUTER, EMAIL, INTERNET, SOCIAL MEDIA AND OTHER ELECTRONIC RESOURCES

OWNERSHIP, USE AND PRIVACY

All electronic resources provided by Sinclair are the sole property of the Company. Users should be aware that the data they create on Sinclair's electronic resources remains the property of Sinclair.

The use of the Company's electronic resources should be for business-related purposes, serving the interests of Sinclair, its clients, and associated parties in the course of normal operations.

Because of the need to protect Sinclair's electronic resources, the Company cannot guarantee that private information stored on any resource belonging to Sinclair will not be accessed or viewed.

For security and network maintenance purposes, authorized individuals within Sinclair may monitor, intercept, and review, without further notice, every employee's activities using the Company's electronic resources and communications systems, including but not limited to email (incoming and outgoing), voice mail recordings, instant messages, and Internet and social media postings and activities, and you consent to such monitoring by your acknowledgment of this Policy. This includes any personally owned or third-party systems intentionally or unintentionally connected to Sinclair's networks and systems, including wireless access points. To be very clear: you should not have any expectation of personal privacy in any communication using Company owned equipment.

Please understand that everything you send electronically is recoverable and discoverable material. For instance, if another employee sues the Company based on something you said or did, your email correspondence, both Company and personal, can be subject to discovery. Also, be aware that deletion of electronic material, such as email and instant messages, does not necessarily remove messages from the system and, depending on the circumstances, could expose the employee to court-ordered sanctions.

GENERAL SECURITY REQUIREMENTS

Effective information security is a "team effort" involving the participation and support of all Sinclair employees, contractors, consultants, and others who deal with information and/or information systems. Individuals must exercise appropriate judgment when accessing electronic resources, and make every reasonable effort to protect the confidentiality, integrity, and availability of Sinclair, client, and associated party data. Email, social media, and downloading from the Internet are prime sources of viruses and other malicious software. With this in mind, all employees, contractors, consultants, and others using Sinclair electronic resources are required to adhere to the following:

- Users are responsible for the security of their user ID's and passwords at all times and should not share them with anyone. All user and system account passwords must be changed every forty-five (45) days, maintained in a secure manner, and should not contain any easily guessed or common words.
- Employees may not use other employee passwords or access the systems of other employees.
- Users should never save or store passwords within applications or web browser sessions.
- Users must lock or log off of their computer when not actively using it. As an additional security measure, PCs, laptops, and workstations within certain environments may be secured with a password-protected screensaver that locks a computer after a period of user inactivity.
- Users must log off of their computer at the conclusion of their day and power it off if not being used by anyone thereafter.
- Users must secure all CDs, DVDs, USB flash drives, or any other storage media containing sensitive information within their work area.
- Information contained on portable computers and devices is especially vulnerable and special care should be exercised at all times when traveling with these devices. All Company portable computers and devices must remain in the employee's possession at all times. This is defined as always secured in the office, home, hotel room, vehicle, or on your person.
- Users must store all files with confidential, proprietary, or personally-identifiable information within secure network locations only (ex. departmental shares), and should never save these types of files to local drives (ex. Documents folder on employee workstation or portable computer).
- Printed documents containing confidential information that are no longer needed should be shredded and not placed in regular wastebaskets or recycling bins.
- Effective information security is a "team effort" involving the participation and support of all Sinclair employees, contractors, consultants, and others who deal with information and/or information systems. Individuals must exercise appropriate judgment when accessing electronic resources, and make every reasonable effort to protect the confidentiality, integrity, and availability of Sinclair, client, and associated party data. Email, social media, and downloading from the Internet are prime sources of viruses and other malicious software. With this in mind, all employees, contractors, consultants, and others using Sinclair electronic resources are required to adhere to the following:
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 - Printed documents containing confidential information that are no longer needed should be shredded and not placed in regular wastebaskets or recycling bins.

UNACCEPTABLE USE

The use of Sinclair's electronic resources must be business-related and employees are responsible for exercising appropriate judgment related to their use. Email, social media and downloading from the Internet are prime sources of viruses and other malicious software. In an effort to characterize what would normally be viewed as inappropriate use of electronic resources, the following types of activities are prohibited:

Web Browsing

- Accessing, viewing, streaming, or downloading any web content related to pornography, gambling, peer-to-peer file sharing, pirated software, Internet radio and television, games, and online web proxies (traffic anonymizers).
- Accessing personal social media platforms (including Facebook and Twitter) for personal, nonbusiness use.
- Accessing personal email (including Gmail, Hotmail, and Yahoo!).

Email, Voice Mail, and Instant Messaging

- Creating, sending, or forwarding "junk" messages (spam), solicitations, chain letters, jokes, or any other personal, non-business messages or attachments.
- Creating, sending, or forwarding any messages or communications related to gossip, containing personal information (non-business related), or attacking and/or harassing in nature.
- Unauthorized use or forging of email header information.

Software

- Installing non-business related or unauthorized software on Sinclair electronic resources. Unauthorized software includes screen savers, games, Internet shareware, upgrades, patches, or any other applications that are not specifically approved for use by Sinclair.
- Downloading, installing, using, or attempting to use any copyrighted content (software, audio, video, etc.) on Sinclair electronic resources for which the Company or the end user does not have a valid license.
- Attempting to bypass content licensing requirements.
- Introduction of malicious programs (ex. malware, worms, etc.) to Sinclair electronic resources.

The lists above are by no means exhaustive and serve as general guidelines for activities which fall into the category of "unacceptable use".

Users of Sinclair systems should use a professional email signature or social media profile. Elements should be simple, professional, and in a style/font easy to read. Examples to include in an email signature or social media profile are name, title, station, telephone number, and/or a professional photograph. Best practices for professional communications include refraining from the use of personal statements or quotations, unprofessional images or profile photographs, and special fonts or graphics in signatures. Similar standards should also be followed for outgoing voicemail messages, instant messages, or other forms of communication systems used by employees.

Sinclair reserves the right to audit the use of electronic resources on a periodic basis to ensure compliance with this Policy.

Those who violate this Policy may be charged on a time and materials basis for repairs and/or remediation activities, have access to SBG electronic resources revoked, and/or may be subject to disciplinary action up to and including termination of employment.

USE OF SOCIAL MEDIA

The Company recognizes that social media platforms are essential news gathering and station promotion or branding resources. Accordingly, access to professional social media accounts as a part of an employee's job function is permitted for business-related purposes. Professional social media accounts are administered and owned by the Company and are subject to approval and monitoring. The Sinclair Broadcast Group, Inc. and Subsidiaries Social Media Policy sets forth guidelines regarding the appropriate use of social media that must be followed by Employees. This Policy may be found on the Company's Intranet.

Employees are ultimately responsible for what they post online and accountable for any publication or posting. Sinclair may monitor content on the Internet. Policy violations may result in disciplinary action up to and including termination of employment.

Termination of Employment

It is the policy of the Company to terminate employment because of an employee's resignation or discharge. Discharge of an employee by the Company may be for cause, without cause, a reduction in the work force, or for any other reason. Any decision to discharge remains within the sole and absolute discretion of the Company. Employees who provide at least two (2) weeks' notice prior to resignation date and remain in good standing will be paid for any unused vacation and personal hours that they have accrued. Employees who do not give two (2) weeks' notice and do not remain in good standing during the notice period will forfeit any accrued time. Employees cannot use vacation or personal time as part of their two-week notice. No sick time may be used during the two-week notice period. Employees who call out sick without a doctor's certificate during the two-week notice period will be disqualified from receiving payout of vacation and personal time at the discretion of the Company. The last day of work is considered the last day that the employee is **actively** at work in the office and all benefits will end according to each benefit plan.

Employees who are not actively at work for more than three months (unless on Military Leave) may be terminated automatically regardless of the reason for the absence (e.g. Workers' Compensation, Long Term Disability, etc.)

Employees must return any issued Company property, such as key card, computer equipment, files or cell phones, no later than the last day of work. Employees will be responsible for any lost or damaged items.

Performance Evaluations

Department Heads and employees are strongly encouraged to discuss job performance and goals on an informal, day to day basis. Formal written performance evaluations will be conducted at the end of an employee's initial period of hire, known as the introductory period. Additional formal performance reviews may be conducted from time to time (e.g. annually) to provide both Department Heads and employees the opportunity to discuss job tasks, identify and correct weaknesses, encourage and recognize strengths, and discuss positive, purposeful approaches for meeting goals.

Drug-Free Workplace

The Company is committed to providing a safe work environment and to fostering the well-being and health of its employees. This commitment is jeopardized when any employee uses illegal drugs or alcohol on the job, comes to work with them in their system, or possesses, distributes, or sells drugs in the workplace. To address this, Sinclair has developed this policy for two primary reasons:

1) employees deserve a work environment that is free from the effects of drug and alcohol abuse and the problems associated with their use, and 2) the Company has a responsibility to maintain a healthy and safe workplace.

- A. It is a violation of Company policy for any employee to possess, sell, trade, or offer for sale illegal drugs or otherwise engage in the use of illegal drugs or alcohol on the job.
- B. It is a violation of Company policy for anyone to report to work or be working with illegal drugs or alcohol in their system.
- C. It is a violation of Company policy for anyone to use prescription drugs illegally. (However, nothing in this policy precludes the appropriate use of legally prescribed medications).
- D. Violations of this policy will result in disciplinary action up to and including discharge

All job applicants who are offered employment with the Company will undergo pre-employment testing for the presence of illegal drugs as a condition of employment. Drug tests are reviewed by competent medical professional personnel who screen out the appropriate use of legally prescribed medicines before reporting the test results to the Company. Any applicant with a confirmed positive test result will be denied employment. In addition, interns and rehires to the Company will also be tested and the same conditions will apply.

The Company has adopted testing practices to identify employees who report to work with illegal drugs or alcohol in their system. It shall be a condition of employment for all employees to submit to drug/alcohol testing under the following circumstances:

- A. When there is reasonable suspicion to believe that an employee has illegal drugs or alcohol in their system.
- B. When employees are involved in on-the-job accidents where personal injury or damage to Company property occurred or could have occurred.
- C. When an employee engages in physical violence or verbal altercations on Company premises or during working hours.
- D. As part of a follow-up to treatment for drug/alcohol abuse.
- E. Fitness for duty.
- F. Department of Transportation compliance (if applicable).

Any employee who believes he or she has a drug or alcohol problem is urged to seek immediate help or contact the Company's Employee Assistance Program or the National Drug and Alcohol Treatment Hotline 1-800-662-HELP for a local referral for assistance. Everyone shares responsibility for maintaining a safe work environment and supervisors and co-workers should encourage anyone who may have a drug or alcohol problem to seek help. The goal of this policy is to balance our respect for individuals with the need to maintain a safe, productive, and drug-free environment.

A complete description of the Company's policy on drugs and alcohol is detailed in a separate Drug/Alcohol Safety Policy which each employee will read and sign. This policy is available on the intranet site.