ON POINT
MARKETING AGENCY

SUBSTANCE ABUSE POLICY

The Company is committed to protecting the safety, health, and well-being of its representatives. The use, possession or sale of substances, such as illegal drugs, controlled substances or alcohol in the workplace, or while on duty, is incompatible with this commitment.

All representatives are absolutely prohibited from unlawfully manufacturing, distributing, selling, offering to sell, purchasing, transferring, dispensing, possessing or using any illegal drug while on the job or performing business on behalf of the Company. Representatives are also prohibited from having any illegal drugs or their metabolites in their bodies at any time while on the job or performing business on behalf of the Company. Any use of an illegal drug or alcohol which contributes to unacceptable job behavior is also prohibited.

Representatives are also prohibited from bringing alcohol onto the premises of any company or company related sites, and from consuming or having alcohol in their bodies while on the job or performing business on behalf of the Company. The only exception to this policy is that a representative may consume alcohol, in moderate amounts, at any work-related gathering or event where alcohol is served or expressly permitted by the Company. If alcohol is permitted and consumed at a work-related gathering, representatives are expected to remain responsible, professional and sober at all times.

For purposes of this policy, "illegal drug" means any drug: (I) which is not legally obtainable, or (2) is legally obtainable but has not been legally obtained. The term includes, but is not limited to, marijuana (including state-authorized marijuana), cocaine, opiates, amphetamines, and PCP. The term also includes prescribed drugs not being used for prescribed purposes and prescribed drugs not being used in the manner or quantity prescribed or by the person to whom it is prescribed. It also includes any substance which a person holds out as an illegal drug.

Unless prohibited by law, the Company reserves the right to conduct drug and alcohol testing on any representative where management has a reasonable suspicion that a representative is impaired or affected on the job by alcohol and/or illegal drugs in violation of this policy. When any supervisor has a reasonable suspicion that this policy has been violated by a representative, that representative may be required to submit to a drug/alcohol screening test immediately upon demand by the Company. The determination of reasonable suspicion will be based upon specific, contemporaneous, articulated observances by one or more supervisors concerning the appearance, behavior, speech and/or body odors of a representative.

Reasonable suspicion may arise from circumstances of a particular accident or injury occurring on the job; from physical altercations between representatives, from obvious impairment of physical abilities such as slurred speech or difficulty maintaining balance, from an unexplained significant deterioration in job performance or behavior; such as excessive absenteeism, from reports of co-workers of on-the-job alcohol or drug use or impairment, from representative admissions regarding alcohol or drug use or from any other evidence reasonably giving rise to suspicion of on-the-job impairment from, or use of, alcohol or drugs. Any supervisor who has reasonable suspicion that a representative is using alcohol or a controlled substance should contact the Vice President - Operations before taking action. The company may also require drug and alcohol

testing after a work-related accident involving personal injury or significant property damages, where it is reasonably suspected that the representative was at fault.

Violations of this policy may lead to disciplinary action, up to and including termination of employment or contract. Additionally, a confirmed positive test result of a representative may result in disciplinary action, up to and including termination of employment, even for a first offense. Failure to consent to a test or any attempt to falsify or alter test results will also result in disciplinary action, up to and including termination of employment or contract.

If required by applicable law, a representative who requests time off to participate in a rehabilitation program will be reasonably accommodated. Representatives may not, however, avoid disciplinary action by seeking a leave of absence for addiction or entering a rehabilitation program after a violation of this or any other Company policy has occurred. Representatives returning from work after completing a rehabilitation program may be required to submit to a period of follow-up drug and alcohol testing.

Under the Drug-Free Workplace Act, a representative who performs work for a government contract or grant must notify the Company of a criminal conviction for drug-related activity occurring in the workplace. The report must be made within 5 days of the conviction. Representatives with questions on this policy should contact the Vice President - Operations.