# **Drug Screen Notification**

Edward Jones conducts drug screening by means of urinalysis or any other testing method, such as blood, saliva, or hair test to the extent such methods may be used under applicable law. Testing will be conducted using an independent laboratory satisfactory to Edward Jones and screenings must be completed within the time period required by Edward Jones.

Associates in Vermont have a right to request a blood sample be taken at the same time as a urine sample for testing.

The substances to be tested for are as follows (subject to any state or local law limitations): Amphetamines/Methamphetamines, Barbiturates, Benzodiazepines, Cocaine and/or metabolites, Methadone, MDA-Analogues, Opiates and/or metabolites, 6-Acetylmorphine, and Phencyclidine.

You have the right to refuse to be screened, but if you refuse, you will not be employed by the firm.

The testing facility will make test results available to the Medical Review Officer (MRO), Edward Jones and to each of their associates and principals who have a reasonable job related basis for receiving them.

If you test positive, you will have an opportunity to provide a list of all prescription and non-prescription drugs you have used in the last 30 days and the circumstances surrounding their use to the MRO. If you wish to provide such a list at the time of testing rather than waiting for results <u>and</u> you are being tested in lowa, Oklahoma or Utah, you may submit such information to the MRO by sending it in writing to:

University Services 2800 Black Lake Place, Suite A Philadelphia, PA 19154 Fax: 1-215-637-6998

Prescription drugs, over-the-counter medications and other substances may result in a positive test result. If you are applying for or hold a position in Vermont therapeutic levels of medically-prescribed drugs will not be reported to the firm by the MRO.

A positive test result, interfering in any way to affect the validity of the test, failure to report for and complete the drug and/or alcohol screening within the required timeframe, failure to consent to a requested screening and/or other violation of Edward Jones' Alcohol and Drug Use Policy or Testing Policy will disqualify you from further consideration for employment at Edward Jones unless applicable law provides otherwise.

If you are a qualified individual with disabilities you may request a reasonable accommodation related to the test method or process used by contacting your recruiter.



### Notice to Montana Residents:

Various federal, state and local laws, statutes, regulations, codes and ordinances (collectively "laws") make it an unlawful and criminal offense to manufacture, distribute, possess, or use a controlled substance. Penalties for violation of these laws include, but are not limited to, citations, monetary fines and penalties, non-monetary fines or penalties, community service, probation, and imprisonment. These sanctions may vary depending on the employee's previous criminal convictions. Further, certain laws may impose mandatory sanctions.

#### Attached:

Edward Jones' Drug Testing Policy and Alcohol and Drug Use Policy

# **Drug Testing Policy**

# **Purpose**

Edward Jones is committed to serving our clients and providing a safe and productive workplace for our associates, principals, clients and visitors. The purpose of this policy is to provide the firm's testing policy and procedures for applicants regarding drugs.

## **Applicability**

This policy applies to all Edward Jones applicants (with the exception of persons tested in Maine) to the extent allowed under applicable law.

## **Policy**

Edward Jones may conduct pre-employment drug testing as provided in this policy. During preemployment screening, such applicants will be advised that they will be subject to pre-employment drug testing and must complete the test within the time period required by Edward Jones. All required testing will be at Edward Jones' expense.

Applicants may receive a conditional offer of employment that requires a negative drug test result as prerequisite for hire. If so, applicants who fail to consent, fail to take the test as directed or have a positive or adulterated test result will have their conditional offer of employment rescinded.

### **Definitions**

Positive drug test result refers to a confirmation of initial test results which reveals positive evidence of the presence of a prohibited drug or controlled substance in the body at or above the firm's screening levels; or, if different screening levels apply under applicable law, at or above what is required under the law.

Negative drug test result refers to initial test results which reveal no evidence of the presence of a prohibited drug or evidence of the presence of a prohibited drug or controlled substance in the body below the firm's screening levels; or, if different screening levels apply under applicable law, below what is required under the law.

An adulterated test result is substituting and/or altering any urine or other sample submitted for testing. Attempting to do so will also be considered an adulterated test result.

Prohibited drugs and controlled substances – See: Alcohol and Drug Use Policy.

### **Process**

### **Testing Process**

Testing will be conducted using an independent laboratory satisfactory to Edward Jones and in compliance with applicable law. Specimens will be collected in accordance with applicable guidelines and chain-of-custody procedures will be followed to account for the integrity of each specimen by tracking its handling and storage from point of specimen collection to final disposition of the specimen.

Edward Jones will test for the following drugs (and their related metabolites): Amphetamines/Methamphetamines, Barbiturates, Benzodiazepines, Cocaine, Methadone, MDA-Analogues, Opiates, 6-Acetlymorphine and Phencyclidine; and reserves the right to and may screen for other prohibited drugs and controlled substances.

Edward Jones may test for drugs by means of a urinalysis, breath test, or any other testing method, such as blood, saliva, or hair test, to the extent such methods may be used under applicable law.

If the initial test indicates a positive result, a confirmation test by gas chromatography/mass spectometry (GC/MS), or its equivalent (or other reasonable testing method acceptable under applicable law), will be used to confirm the presence of a specific drug. The confirmation test shall be independent of the initial test and use a different technique and chemical principle from that of the initial test in order to ensure reliability and accuracy. For classes of drugs where GC/MS is not an approved confirmation procedure, an alternative confirmation test will be used.

## Administrative Process, Test Results and Review Procedures

Before undergoing testing and when required, applicants must sign a Drug Screening Consent and Acknowledgment of Understanding form.

Screenings must be scheduled and completed within the time period required by Edward Jones. If they are not, the applicant's offer of employment will be rescinded. The firm may, in its sole discretion, make an exception, in which case multiple test methods may be used to help assure that the deadline was not missed to evade detection of drugs.

In the event an applicant submits to screening, but fails to provide a suitable specimen that meets the acceptable parameters as established by Edward Jones and/or the drug testing lab, the applicant's offer of employment will be rescinded. When medically justified the firm, in its sole discretion, may make an exception and provide an opportunity to the donor to retest under direct observation (i.e. witnessed specimen collection), where applicable law allows.

The Medical Review Officer (MRO) will review the results of the drug test when required and will consult with the laboratory that analyzed the specimen, if needed. The MRO will make reasonable efforts to reach any donor with confirmed positive results by telephone to give the donor the opportunity to discuss all prescription and non-prescription drugs he or she has used in the last 30 days, to explain the circumstances surrounding their use and to provide any other information he or she wishes to help enable the MRO to determine if there is an alternative medical explanation for the confirmed positive result. Any applicant contacted by the MRO regarding a positive result must speak to the MRO within three (3) business days (or the timeframe provided for by applicable law) of initial contact; otherwise the result will be reported to Edward Jones as positive.

Prescription drugs, over the counter medications and other substances may result in a positive test result.

The MRO will provide Edward Jones documented verified results of all drug tests reviewed. When the MRO advises the firm that a donor has a confirmed positive result, the firm will then verbally notify the donor. In jurisdictions that require a written notification, the firm will also provide an appropriate written notice.

A tested applicant will be provided with a copy of his or her test results upon written request to the MRO unless otherwise provided based on applicable law. A donor notified of a verified positive drug test may contest the results and/or request a retest of the split specimen in those states that so require. The request may be verbal or in writing to the MRO. No split specimen testing will be provided for an invalid result.

An applicant's conditional offer of employment will be rescinded if he or she is determined to have a verified positive test result.

Records created in connection with the administration of this policy, including test results, will be treated in a confidential manner with proper regard to an individual's privacy interests. Such information will be released to the donor when applicable law requires, to firm representatives who need it to determine and take appropriate action related to the donor, and to others when appropriate in connection with a legal or administrative claim. The MRO will be directed not to release any information to the firm obtained through testing that is unrelated to the use of a prohibited drug or controlled substance.

### Reasonable Accommodation for Testing

The firm provides reasonable accommodations for qualified individuals that do not result in undue hardship, which may include adjustments to testing methods or processes. Requests for reasonable accommodations should be directed to HR Help.

### **Contact**

If you have any questions, or need further clarification on any of the above:

- Call HR Help in Human Resources @ 800-440-3060 or 314-515-1006 or ext. 5-1006.
- Email: HRHELP@edwardjones.com

This policy is not a contract. None of its contents are to be construed as creating actual, contractual or other enforceable rights on behalf of any associate, contractor or other party against Edward Jones. The document reflects Edward Jones' policies and/or practices in effect at the time of publication; and all prior policies and practices are superseded. Edward Jones reserves the right to revise this document and modify, add to, or delete any of its provisions in its sole discretion, at any time, with or without prior notice; and the associate's continued employment after any modification is made will be deemed the associate's consent to abide by the modifications.

# **Alcohol and Drug Use Policy**

#### **Purpose**

Edward Jones is committed to serving our clients and providing a safe and productive workplace for our associates, principals, clients and visitors. The purpose of this policy is to provide the firm's expectations regarding the use and/or abuse of alcohol and drugs. It is also intended to highlight the firm's Employee Assistance Program and encourage associates and principals who may need assistance to seek help in overcoming a drug and/or alcohol dependency.

# **Applicability**

This policy applies to all Edward Jones associates and principals to the extent allowed under applicable law.

# **Policy**

Edward Jones prohibits using, being under the influence of, possessing or distributing any prohibited drug or controlled substance (as defined by this policy) during working hours, while engaged in Edward Jones business, on Edward Jones' premises or at an Edward Jones function.

Edward Jones prohibits using, being under the influence of, or possessing alcohol during working hours, while engaged in Edward Jones business or on Edward Jones' premises. Alcohol may be used at an Edward Jones function if its use at the function is approved by the firm and its use by the associate or principal does not result in conduct that is inappropriate or unprofessional.

Conduct that is unprofessional or risks reputational harm to the firm is prohibited, regardless of when or where the conduct occurs. The firm reserves the right to take appropriate measures to address any concerns, including those resulting from the use or possession of a prohibited drug, controlled substance or alcohol.

Storing alcohol, any prohibited drug or controlled substance or drug paraphernalia in a desk, locker, personal effect or other receptacle on Edward Jones' premises is prohibited.

Edward Jones may search any associate or principal or their personal belongings while on an Edward Jones premises or at an Edward Jones function.

Associates and principals are expected to immediately report situations they believe violate this policy to Associate Relations, including without limitation, reporting a suspicion that an associate or principal may be under the influence or intoxicated while working, the behavior of an associate or principal who appears to be altered or conduct that appears to be inappropriate.

Anyone who violates this policy, fails to fully consent to and/or cooperate with drug and/or alcohol testing or search will be subject to disciplinary action, up to and including termination of employment. In addition, anyone who fails to cooperate with or hinders an investigation or provides false information may be subject to disciplinary action, up to and including termination of employment.

Edward Jones prohibits retaliation against any one for reporting matters they believe violate this policy or for cooperating in an investigation. See Also: Anti-Retaliation Policy

### **Definitions**

Prohibited drugs and controlled substances include any of the following, but are not limited to:



- Any controlled substance listed in schedules I through V of the federal Controlled Substances Act (21 U.S.C. § 812), medication, or other chemical substance, mind or mood altering substances or inhalants that are not legally obtainable.
- Look-alike or similar counterfeit controlled substances and any other substances as defined by statute which are considered illegal.
- Synthetic drugs.
- Prescription drugs legally obtained but not being used for their prescribed purposes or which are being used in excess of their prescribed purpose or dosage.
- Inhalants or other substances legally obtained but being misused or abused instead of their intended purpose.
- Unauthorized prescription drugs, including those prescribed to another person.

For purposes of this policy, premises means business properties, buildings, parking areas and vehicles leased, owned and/or operated by Edward Jones.

## **Process**

## **Alcohol and Drug Testing**

Edward Jones may conduct drug and/or alcohol testing pursuant to its testing policies; however, the firm reserves the right to discipline an associate or principal for a violation of this policy without first conducting drug or alcohol testing.

#### **Gifts**

In the event that alcohol is received as a gift at an Edward Jones premises, it is expected that the alcohol not be stored or displayed and that it is removed from the premises at the associate's or principal's earliest opportunity.

#### **Accommodations**

Edward Jones complies with the Americans with Disabilities Act (ADA), as amended, and all applicable laws and regulations concerning the employment of persons with disabilities. Requests for reasonable accommodations should be directed to HR Help who will engage with Associate Relations to discuss the request. See Also: Americans with Disabilities Act Policy.

# **Employee Assistance Program**

Edward Jones encourages associates, principals and their immediate family members who need support in helping to address a drug and/or alcohol dependency to utilize the firm's Employee Assistance Program (EAP) provider, ComPsych GuidanceResources®. ComPsych Guidance Resources® is available twenty-four hours a day, seven days a week at 1-800-428-2963 or www.guidanceresources.com. Voluntary EAP services are completely confidential.

Associates or principals who believe a colleague appears to be in need of assistance should contact Associate Relations or a designated Human Resources representative.

### **Contact**

If you have any questions, or need further clarification on any of the above:

- Call HR Help in Human Resources @ 800-440-3060 or 314-515-1006 or ext. 5-1006.
- Email: HRHELP@edwardjones.com

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