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1 of 12**DRUG-FREE WORKPLACE POLICIES AND PROGRAMS****OBJECTIVE**

The Discovery World Corporation (DWC) acknowledges the problem of drug abuse in our society. As our company sees drug abuse as a serious threat to our employees and stakeholders, we commit to our efforts to address the problem by issuing this substance abuse policy and program to ensure that our company will be a drug-free workplace.

Drug addiction is a complex, yet treatable disease. It is for this reason that our drug prevention and control program aims to prevent this from happening in the workplace while at the same time assisting drug users to seek treatment.

The ultimate goal of this policy is to balance our respect for individual privacy with our need to keep a safe, productive, drug-free environment. We would like to encourage those who use drugs to seek help in overcoming their problem. In this way, fully rehabilitated drug users who remain drug-free can return to work as employees in good standing.

I. POLICY STATEMENT**A. DWC explicitly prohibits:**

1. The use, possession, transport, solicitation for, or sale of dangerous drugs and/or equipment, instrument, apparatus, paraphernalia fit or intended for smoking, consuming, administering, injecting, ingesting, or introducing any dangerous drug into the body on or away from company premises or while performing an assignment.
2. Being impaired or under the influence of dangerous drugs away from the company, if such impairment or influence adversely affects the employee's work performance, the safety of the employee or of others, or puts at risk the company's reputation.
3. Possession, use, solicitation for, or sale of dangerous drugs away from the company premises, if such activity or involvement adversely affects the employee's work performance, the safety of the employee or of others, or puts at risk the company's reputation.

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4. The presence of any detectable amount of dangerous drugs in the employee's system while at work, while on the premises of the company, or while on company business.
 - B. "Dangerous Drugs" include those listed in the Schedules annexed to the 1961 Single Convention on Narcotic Drugs, as amended by the 1972 Protocol, and in the Schedules annexed to the 1971 Single Convention on Psychotropic Substances as enumerated in the attached annex of R.A. 9165.
 - C. Violation of all these listed above will result in disciplinary/administrative proceedings with a maximum penalty of termination from employment. This is without prejudice to the filing of a criminal case against the employee by the appropriate authority.

II. DEFINITION OF TERMS

- A. *Legal Drug* refers to prescribed drug or over-the-counter drug which has been legally obtained and is being used solely for the purpose of curing disease for which it was prescribed or manufactured.

Refer to the definition of prohibited drugs under the Dangerous Drug Act.

- B. *Illegal Drug* refers to any drug (a) which is not legally obtainable, (b) which may be legally obtainable but has not been legally obtained, or at which is being used in a manner or for a purpose other than as prescribed.
- C. *Random Drug Test* refers to an unannounced schedule of testing with each employee having an equal chance of being selected for testing.
- D. *Assessment Team* refers to the team composed of the safety and health committee including occupational safety and health (OSH) personnel, Chief Compliance Officer, and the Security Officer trained to address all aspects of drug prevention.
- E. *Confirmatory Test* refers to an analytical test using a device, tool or equipment with a different chemical or physical principle that is more specific which will validate and confirm the result of the screening test. It refers to the second or further analytical procedure to more accurately determine the presence of dangerous drugs in the specimen.

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III. SCOPE

All employees, full time, probationary, project hires, consultants, and regardless of position title and job level.

IV. POLICY GUIDELINES

The abuse of drugs and dangerous drugs dependence is not tolerated nor condoned by DWC. It is a standard of conduct of employees of DWC that employees shall not use illegal drugs. In order to maintain this standard, DWC will establish and maintain the programs related to the prevention of drug abuse in the workplace.

A. Advocacy, Education, and Training

1. The President will order the creation of an Assessment Committee responsible for increasing awareness and education of all employees on the adverse effects of dangerous drugs as well as the monitoring of employee susceptible to drug abuse. This committee shall be composed, at the minimum, of the heads of Compliance, Security, and Operations.
 2. Training on the prevention, clinical assessment, and counseling shall be given to employees who will be part of the Assessment Committee which shall address all aspects of drug abuse prevention, treatment, and rehabilitation.
 3. Compliance Office shall be responsible for ensuring that education materials such as posters and infographics, brochures, are posted or made available in conspicuous places such as the employee bulletin board, employee cafeteria, and in all other locations within the company where employees often congregate. These materials shall be changed twice a year.
 - a. Chief Compliance Officer shall request DOLE, DOH, and other agencies for materials.
 - b. DWC may create its own information materials.
- B. DWC is committed to increasing the awareness and education of its officers and employees on the adverse effects of dangerous drugs through continuous advocacy, education and training programs/activities to all its officers and employees.

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C. All employees are required to undergo an orientation/education program before their assumption of their respective duties. As such, this education program shall be part of the new hire on-boarding and will include the following topics:

1. Salient features of R.A. 9165;
2. Adverse effects of abuse and/or misuse of dangerous drugs on the person, workplace, family and the community;
3. Preventive measures against drug abuse; and
4. Steps to take when intervention is needed, as well as available services for treatment and rehabilitation.

D. To encourage all officers and employees to lead a healthy lifestyle while at work and at home, DWC will randomly conduct the following activities on an annual basis:

1. Lifestyle assessment programs on health nutrition, weight management, stress management, alcohol abuse, smoking cessation, and other indicators of risk diseases;
2. Health wellness screenings (*e.g. blood pressure and heart rate, cholesterol test, blood glucose, etc.*);
3. Sports, recreational and fun-game activities; and
4. Other activities promoting health and wellness.

E. General Procedure

1. An employee reporting for work visibly impaired or unable to properly perform his duties because of alcohol or illegal drug use shall not be allowed to enter the work premises.

If there is sufficient basis to suspect that an employee is impaired, the employee should first be assessed the Company's Assessment Team/Committee before sending the employee to a medical facility for drug testing, depending on the determination of the observed impaired, accompanied by the employee's immediate supervisor, a representative of Compliance Office or Security, and co-employee if necessary.

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F. Pre-Employment Drug Abuse Testing

DWC, through its accredited medical providers, will conduct pre-employment drug testing examinations designed to prevent the hiring of individuals who use illegal drugs or individuals whose use of legal drugs indicates a potential for impaired or unsafe job performance. The cost of this test shall be to the account of DWC.

G. Current Employee Drug Abuse Testing

1. DWC will implement random drug testing practices to identify employees who use illegal drugs, either on or off the job. This will be conducted at least once a year and led by Compliance Office. DWC, the testing laboratory, drug rehabilitation programs and its agents who receive or have access to information concerning drug tests shall keep all information confidential.
2. It shall be the condition of continued employment for all employees to submit to a drug test when:
 - a. The employee is involved in any mishap or accident in which injury to self or other persons or damage to property and DWC reputation has occurred. Testing will be conducted immediately so as to facilitate compensation claims for work-related injuries. Accidents that are not drug related may qualify the employee to such benefits.
 - b. The employee is involved in an incident arising from or in the course of work which could have led to injuries or fatalities and/or considerable damage to DWC, even in its reputation, had it not been curtailed.

H. Employee Assistance and Drug Rehabilitation Programs

1. DWC shall maintain a database on employee assistance programs and drug rehabilitation programs which could provide help to employees who suffer from drug abuse and their families.
2. Compliance Office shall provide the names, addresses, and contact details of at least three (3) facilities which the employee can choose from.

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3. A complete list of programs is available with the Compliance Office and these facilities are DOH-accredited.
 4. It is the responsibility of every employee to seek assistance from one of these programs. The cost of the treatment shall be to the account of the employee.
- I. Grounds for Termination or Discipline
1. Failure to submit to the required medical or physical examinations, including drug testing and facilities inspection such as the employee's workstation or company-assigned locker, is considered a misconduct and shall be grounds for disciplinary action as prescribed by DWC's Code of Conduct.
 2. An employee bringing in to DWC's premises or property, having possession of; being under the influence of; possessing in the employee's body, blood, or urine in any detectable amount; or using, consuming, transferring, transporting, selling, or attempting to sell, transport, transfer any form of illegal drug including equipment, instrument, apparatus, paraphernalia fit or intended for smoking, consuming, administering, injecting, ingesting, or introducing any dangerous drug into the body while on DWC official business or at any time while the employee is on the DWC property, whether on duty or not, and whether on business or on the property or not, is guilty of misconduct and is subject to discipline, including immediate termination for cause or immediate suspension from work as per DWC's Code of Conduct.

V. TESTING PROCEDURES AND GUIDELINES

A. General Procedures

1. Drug testing will be accomplished via a urinalysis test, in most cases, at a laboratory chosen by DWC through any of its accredited laboratories. Such laboratory shall be licensed and approved by the Department of Health.
2. Employees may be tested for any or all of the drugs contained on the lists of PDEA.
3. All specimen samples shall be collected with due regard to the privacy of the employee providing the sample, and in a manner reasonably calculated to prevent substitution or contamination of the sample.

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4. Specimen collection shall be documented, and the documentation procedures shall include:
 - a. Labeling of specimen containers so as to reasonably preclude the likelihood of erroneous identification to test results.
 - b. A Consent Form for the employee or job applicant to provide any information he or she considers relevant to the test, including identification of currently or recently used prescription or non-prescription medication, or other relevant medical information. Such form will provide notice of the most common medications by name which may alter or affect a drug test. The providing of information shall not preclude administration of the drug test, but shall be taken into account in interpreting any positive confirmed results. These forms are available from the Compliance Office.
 - c. It is the right of the employee or job applicant to consult the testing laboratory for technical information regarding prescription and non-prescription medications. The name, address, and telephone numbers are available from the Compliance Office.
5. Any drug test conducted or requested by DWC or its Assessment Committee/Team may occur before, during, or immediately after the regular work period of the employee and shall be deemed to be performed during work time for the purpose of determining compensation benefits for the employee.
6. Within five (5) working days after receipt by of a positive confirmed test result from the testing laboratory, Chief Compliance Officer shall inform the Assessment Committee/Team and shall inform the employee or job applicant in writing of such positive test result, the consequences of such results, and the options available to the employee or job applicant. Compliance Office will also provide the employee or job applicant, upon request, a copy of the test results.
7. Within five (5) working days after receipt of a positive confirmed test result, the employee or job applicant may submit information to the Assessment Committee/Team explaining or contesting the test results, and why the results do not constitute a violation of company's policy.
8. If an employee or job applicant's explanation or challenge of the positive test results is unsatisfactory to the Assessment Committee/Team, a written explanation

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by the Assessment Committee/Team as to why the employee or job applicant's explanation is unsatisfactory along with the report of positive results will be provided by the Compliance Office to the employee or job applicant and all such documentation will be kept by Compliance Office in a confidential manner, for a period of at least one (1) year.

9. Every specimen that produces a positive confirmed result shall be preserved in a frozen state by the licensed laboratory that conducts the confirmation test for a period of 210 days from the time the results of the positive confirmation test are delivered to DWC. However, if an employee or job applicant undertakes an administrative or legal challenge to the test result, the employee or job applicant shall notify the laboratory and the sample shall be retained by the laboratory until the case or administrative appeal is settled. During the 180 day period after written notification of a positive test result, the employee or job applicant who has provided the specimen shall be permitted by DWC to have a portion of the specimen retested, at the employee or job applicant's expense, at another laboratory, licensed and approved by the Department of Health, chosen by the employee or job applicant. The second laboratory must test at equal or greater sensitivity for the drug in question as the first laboratory. The first laboratory which performed the test for the company shall be responsible for the transfer of the portion of the specimen to be retested and for the integrity of the chain of custody during such transfer.

B. Testing Costs

DWC shall pay the cost of all drug tests, initial and confirmation, which are required during and in consideration of employment.

C. Statement of Confidentiality

DWC, the testing laboratory, drug rehabilitation programs and their agents who receive or have access to information concerning drug tests shall keep all information confidential. Release of such information under any other circumstances shall be solely pursuant to a written consent form signed voluntarily by the person tested, except where such release is compelled by a hearing officer or a court of competent jurisdiction pursuant to an appeal, or where deemed appropriate by a professional or occupational licensing board in a related disciplinary proceeding.

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VI. TREATMENT, REHABILITATION AND REFERRAL

- A. Employees found to be drug abusers or drug dependents will be given one (1) chance to undergo treatment and rehabilitation for a maximum period of six (6) months subject to the terms and conditions embodied in this policy and pertinent laws such as Republic Act No. 9165 – The “Comprehensive Dangerous Drugs Act of 2002”, Republic Act No. 6425 – The “Dangerous Drugs Act of 1972”, as amended; the Revised Penal Code, as amended; or any special penal laws.
- B. DWC shall endeavor to assist employees by allowing them to undergo one (1) period of treatment and rehabilitation when they have fallen victim to drug abuse or dangerous drugs dependence, as certified by a DOH-accredited physician at the instance of the Compliance Office, through a treatment and rehabilitation program with a maximum of six (6) months in a government center (Center) provided that there is no other violation of DWC’s rules and regulations and/or policies and procedures in conjunction with the employee’s drug abuse/dependence. The employee may be granted leave without pay for the duration of the period of treatment or rehabilitation not to exceed six (6) months.
- C. The Assessment Team shall determine whether or not an employee found positive for drugs would need referral for treatment and/or rehabilitation in a DOH accredited center. This option is only given to employees who are diagnosed with drug dependence for the first time, or who turn to the assessment team for assistance, or who would benefit from treatment and rehabilitation. Following rehabilitation, the assessment team, in consultation with the head of the rehabilitation center shall evaluate the status of the drug dependent employee and recommend the resumption of his job.
- D. A drug dependent, who has voluntarily submitted himself/herself under the treatment and rehabilitation program prescribed, and who is finally discharged from confinement with a maximum period of six (6) months, may be allowed back to work and may be exempt from any administrative liability directly relating to drug abuse or dependence, as recommended by the Assessment Committee/Team provided that the following conditions are met:
1. The employee has complied with the rules and regulations of the Center, the applicable rules and regulations of the Dangerous Drugs Board (DBB);

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2. The employee has never been charged or convicted of any offense punishable under the Republic Act No. 9165 – The “Comprehensive Dangerous Drugs Act of 2002”, Republic Act No. 6425 – The “Dangerous Drugs Act of 1972”, as amended; the Revised Penal Code, as amended; or any special penal laws;
 3. The employee poses no serious danger to himself/herself or the community which shall be solely determined by DWC;
 4. The employee agrees to be examined by a DOH-accredited physician chosen by DWC and be subjected to an independent drug test by a laboratory accredited and monitored by the DOH at the direction of DWC for up to eighteen (18) months after discharge from a Center; and
 5. The employee shall not have committed any other violation of DWC’s rules and regulations and/or policies and procedure.
- E. Upon certification from the Center that a drug dependent, within the voluntary submission program, may be temporarily released from confinement (but not earlier than forty-five (45) days after initial admission to the Center), he/she shall report to the DOH for after-care and follow-up treatment, including urine testing for a period of eighteen (18) months under terms and conditions that the DDB or court may impose.
- F. Failure of the employee to be able to report for work after the maximum six (6)-month treatment and rehabilitation period will result in separation from employment.
- G. An employee will be subjected to disciplinary proceedings with a maximum penalty of termination of employment in accordance with the Code of Conduct and without prejudice to any criminal case that may be filed against him/her by the appropriate authority if after it is initially determined by a DOH-accredited physician that he/she is a drug abuser/dependent or tests positive for drug abuse/dependence by a laboratory accredited and monitored by the DOH and:
1. The employee refuses to undergo treatment and rehabilitation;
 2. The employee tests positive for drug abuse/dependence after the initial confinement and/or maximum six (6) month treatment and rehabilitation period and/or after being allowed to report back for work.

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- H. Any leave without pay attributable to treatment and rehabilitation of an employee who is declared to be a drug abuser/dependent is deducted from an employee's length of service record and consequently, the computation for one's retirement benefits is affected as well.
- I. All costs for the treatment and rehabilitation shall be to the account of the employee under rehabilitation. The period during which the employee is under treatment or rehabilitation shall be considered as authorized leaves up to a maximum period of six (6) months.
- J. Repeated drug use even after ample opportunity for treatment and rehabilitation shall be dealt with the corresponding penalties under R.A. 9165 and is a ground for dismissal.

VII. MONITORING AND EVALUATION

The implementation of the drug-free workplace policies and programs shall be monitored and evaluated annually by Assessment Committee/Team to ensure that the goal of a drug-free workplace policies and programs are met and will ensure the achievement of the objectives of a drug-free workplace. The Committee may submit to the Chief Compliance Officer its recommendations for any amendments. The President will evaluate the proposal and make the necessary changes as required.

VIII. EFFECTIVITY

This Policy shall take effect immediately and shall be made known to all employees.

Issued by:

(Original signed)

Anna May B. Nieva

Chief Compliance Officer

November 18, 2014

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President

November 18, 2014

Date

Violations of any of the provisions contained in this policy are governed by DWC's Code of Conduct, if applicable.

Discovery World Corporation shall have the sole and exclusive prerogative to add, amend, revise, and/or delete this policy. In the event that there is a need to add, amend, revise, and or delete portions of this policy, the Chief Compliance Officer must first submit to the President its request citing the reasons for the change. If approved, the said change shall be made by DWC.

In the event any portion of this policy is repealed by provision of law, it shall not affect the remaining provisions that are consistent with the law.