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POLICY STATEMENT:

AAR Corp. ("the Company" or "AAR") is committed to the goal of maintaining a drug and alcohol-free workplace. The use of illegal drugs and alcohol misuse by employees is inconsistent with the longstanding commitment of AAR to a safe and productive work environment. AAR's Company Drug and Alcohol Policy ("Policy") is designed to discourage illegal drug and alcohol misuse by its co-workers to foster a better working environment, improve personal health and wellness, and continue to provide a safe and reputable travel experience as possible for AAR's customers. We are all responsible for running a safe operation and maintaining a safe and healthy workplace and compliance with this policy is a critical part of this important culture.

AAR's Drug and Alcohol Testing Policies consist of two parts:


- The Company Drug and Alcohol Policy applies to all AAR employees, both DOT and NONDOT.
- The Department of Transportation (DOT)/Federal Aviation Administration (FAA) required policy applies only to FAA covered employees and applicants. See that separate DOT/FAA policy for those required tests and guidelines.

For additional information regarding AAR's Drug and Alcohol Policies, please contact your HR Representative or AAR's Designated Employer Representative (DER).

SCOPE:

This policy applies to all employees of the Company (except as otherwise set forth in an applicable collective bargaining agreement) and all applicants for employment with the Company.

***The Company Drug and Alcohol Policy is separate from the DOT/FAA Drug and Alcohol Policy which outlines specific testing procedures and guidelines that only apply to DOT/FAA covered employees. DOT/FAA covered employees may be tested under the Company Drug and Alcohol Policy when testing occurs outside of those specific guidelines.*

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POLICY DETAILS:

A. PROHIBITED SUBSTANCES

Applicants and employees may be tested for evidence of the following drugs or metabolites of these drugs during each test type covered below:

- Amphetamines
 - Includes Methamphetamine and MDMA
- Cocaine
- Marijuana (THC)
- Opioids
 - Includes Codeine, Morphine, Heroin, Hydrocodone, Hydromorphone, Oxycodone, Oxymorphone
- Phencyclidine (PCP)

Additional drugs or metabolites may be added at the discretion of the Company.

Please note that the Company Drug and Alcohol Policy applies regardless of any state law permitting the use of marijuana (or other drugs) outside of work.


Additionally, all employees are prohibited from performing or continuing to perform work functions while having an alcohol concentration of 0.020 or greater.

B. ZERO TOLERANCE POLICY

AAR determines discipline and enforces its policy as outlined in the Company Drug and Alcohol Policy.

Any employee who tests positive for prohibited drugs or alcohol (at or above 0.020) or refuses to test will be subject to disciplinary action, up to and including termination.

The Company will not hire or rehire any individual who has been lawfully terminated by any employer, including AAR, due to a positive drug or alcohol test or refusal to submit to such testing.

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C. CONSEQUENCES FOR VIOLATIONS

Any covered employee who receives a verified positive drug and/or alcohol test result on a required test will be immediately removed from their duties and subject to disciplinary actions up to and including termination.


Employees may not refuse to submit to a drug and/or alcohol test that is being carried out according to Company policy and continue to perform work functions.

A refusal to take a drug test can include any of the following:

- Failure to proceed immediately to the test site or remain at the designated test site until released by the collector.
- Failure to provide a urine specimen when required.
- Tamper, adulterate, or substitute a urine sample, including an attempt to tamper, adulterate or substitute a urine sample.
- Failure to permit a directly observed or monitored collection as determined by the Medical Review Officer (MRO) and/or the DER.
- Declining to take a second test when directed by the MRO or the DER.
- Failure to provide sufficient urine after 3 hours without any legitimate medical explanation as deemed by the MRO.
- Failure to undergo a medical evaluation.
- Failure to cooperate with any part of the testing process.

A refusal to take an alcohol test can include any of the following:

- Fail to appear for any test within a reasonable time, as determined by the company, after being directed to do so by the company.
- Fail to remain at the testing site until the testing process is complete.
- Fail to provide an adequate amount of breath for any alcohol test required by this policy.
- Fail to provide a sufficient breath specimen, and the physician has determined, through a required medical evaluation, that there was no adequate medical explanation for the failure.
- Fail to undergo a medical examination or evaluation, as directed by the company as part of the insufficient breath procedures.
- Fail/refuse to sign the certification at Step 2 of the ATF.
- Fail to cooperate with any part of the testing process.

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An employee who refuses to take such a test will face disciplinary action up to and including termination.

Denial of Employment

- Applicants who test positive for drugs and/or alcohol or refuse to test, will be denied employment.
- Applicants who committed DOT violation(s) in their prior employment may be denied employment.

Loss of Workers Compensation Benefit

- Employees whose on-the-job injury involves his or her use of drugs or alcohol may lose the opportunity to collect workers' compensation benefits.

Other Alcohol Related Content


- Employees found to have an alcohol concentration of 0.020 or greater but less than 0.040 shall not perform or continue to perform work-related functions and will be subject to discipline up to and including termination.

D. DRUG TESTING PROCEDURES


The Company affirms the need to protect individual dignity, privacy, and confidentiality throughout the testing process.

All testing shall be conducted in a manner to assure the highest degree of accuracy and reliability, using techniques, equipment and a Health and Human Services (HHS) certified laboratory facility.

Drug Testing Procedures

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- Except for medical emergencies, the employee must proceed directly to the company authorized testing facility to test as scheduled and without delay for any reason.
 - Testing will not be delayed awaiting a third party, such as a union representative. Failure to proceed directly and without delay to the testing facility may be deemed a Refusal to Test and treated accordingly.
- Strict chain-of-custody procedures will be followed during the collection, transportation and laboratory testing of the specimen. The employee will be required to participate in certain portions of these procedures.
- The employee or applicant must remain at the collection site until a specimen is collected and the collection process is complete.
- An employee or applicant will be required to produce a specimen under direct observation only when:
 - the first specimen's temperature is out of range.
 - the collector has reason to believe that the employee/applicant has brought in something to adulterate/substitute for the specimen prior to the collection beginning.
 - the collector has reason to believe the specimen contains an adulterant.
 - when directed by the MRO or DER.
 - for all Return to Work and Follow Up tests.
- Direct observation collection procedures are as follows:
 - Direct observation collections will be conducted by same gender observers.
 - The donor will be required to raise his or her shirt, blouse or dress, as appropriate, above the waist; and lower clothing and underpants to show, by turning in a circle, that he or she does not have a prosthetic device.
 - The donor will be allowed to return clothing to its proper place following the determination of the observer that a device is not present.
 - The observer will then be required to observe the flow of urine from the body into the collection cup.
- The specimen will be sent to an HHS certified laboratory for testing.


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- If the test results are reported as **Positive** and the employee does not agree with the results, he/she may request that the split specimen from the original collection be retested at another HHS certified laboratory at the employee's expense. The results of the reconfirmation test will prevail, and no other test or further appeal is permitted.
- If the test results are reported as **Negative -Dilute** for a Random test, the employee will be sent for another collection within 48 hours, or on the next scheduled shift. For all other Negative – Dilute specimens, the test is deemed as a negative test, and a retest is not required.
- If the MRO reports a specimen as **Positive – Dilute**, the test will be deemed as a positive test. No additional testing will be administered.

E. ALCOHOL TESTING PROCEDURES


The Company will utilize a qualified professional to administer its alcohol testing for all employees. Breath Alcohol testing will be performed by a Breath Alcohol Technician (BAT) or Screening Test Technician (STT) who has received training and proven proficiency on the device used.

- Except for medical emergencies, an employee must proceed directly to the company authorized testing facility to test as scheduled and directed without delay.
 - Testing will not be delayed awaiting a third party, such as a union representative. Failure to proceed directly and without delay to the testing facility may be deemed a Refusal to Test and treated accordingly.
- When an employee enters the alcohol testing location, the BAT or STT will require the employee to provide positive identification (photo ID or valid identification issued by AAR or other government issued ID). On request, the BAT/STT will provide positive identification to the employee.
- The initial screening test can be performed using an Evidential Breath Testing (EBT) device or an Alcohol Screening Device (ASD). The device

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utilized must be approved by DOT and listed on the Conforming Products List (CPL).

- The BAT/STT will explain the testing procedures to the employee.
- The BAT/STT will perform the test according to the manufacturer's guidelines and follow the Quality Assurance Plan (QAP) for that device to ensure accuracy of results.
- A screening test result of 0.000 – 0.019 is a negative test, and no further testing is performed.
- A screening test result of 0.020 or higher will require that the technician perform a second confirmation test.
- The BAT will explain that a second confirmation test will be performed after the required 15-minute waiting period has expired.
- During the wait period, the BAT will instruct the employee not to eat, drink, put any object or substance in his or her mouth, and, to the extent possible, not belch during a waiting period before the confirmation test.
 - The BAT will also explain that the test will be conducted at the end of the waiting period, even if the employee has disregarded the instruction, and the BAT will note this in the "Remarks" section of the ATF.
- Any confirmation test must be performed by a BAT using an EBT device approved by DOT and listed on the CPL.
- If a confirmation test is required, the results of the confirmation test will be the results of record, regardless of the initial screening test results.
 - A confirmation test result of 0.000 – 0.019 is a negative test.
 - A confirmation test result of 0.020 – 0.039 is a 'stage 1' or 'twilight' result.
 - A confirmation test result of 0.040 or greater is a true positive result.

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F. CIRCUMSTANCES REQUIRING DRUG AND ALCOHOL TESTING

Pre-Employment Drug Tests

- Pre-Employment NONDOT drug tests are conducted prior to hiring an applicant at AAR. Negative drug test results must be received prior to the first day of work.
- Drug tests should be conducted as soon as practical after a conditional offer is extended. A job offer may be withdrawn unless the individual tests as scheduled or earlier.
- Contractors or other personnel on loan to the Company as contingent workers through an agency may not perform a covered function for the Company unless:
 - The Company has a contractual relationship with the agency and
 - The Company has verified that the contracted individual is subject to the contractor's testing program
- AAR will deny or withdraw the offer of employment to an applicant who has a refusal to test or a verified confirmed positive drug test result on a Pre-Employment test.

Reasonable Suspicion Drug and Alcohol Testing


- Reasonable Suspicion NONDOT Drug and Alcohol testing occurs when at least two supervisors, at least one of whom is trained in detecting the indicators of drug and alcohol use, both substantiate and concur in the decision that reasonable cause exists to test an employee.
- The determination to test must be based on a supervisor's specific, contemporaneous, articulable observations concerning the appearance, behavior, speech or body odors of the employee.
- Indications that reasonable cause to test exists include but are not limited to the following:
 - Use or possession of drugs
 - Slurred speech
 - Unsteady standing or walking
 - Unsafe actions
 - Inability or difficulty doing routine tasks

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- Disorientation or confusion
 - Erratic or unusual behavior
- If an employee acknowledges alcohol use prior to coming to work but claims to have the ability to work, he/she must be tested.
- The alcohol test should be performed as quickly as possible from the time of determination to test.
 - If not performed within 2 hours, the determining supervisor/department officials must prepare and maintain on file a record stating why the test was not properly administered.
 - If not performed within 8 hours, the attempts to administer the test must cease and the record must contain the reasons for not administering the test.
- The drug screen should be performed as quickly as possible from the time of determination to test.
 - If not performed within 8 hours, the determining supervisor/department officials must prepare and maintain on file a record stating why the test was not properly administered.
 - If not performed within 32 hours, the attempts to administer the test must cease and the record must contain the reasons for not administering the test.
- Employees awaiting test results will be placed on probationary status and sent home without pay during the time required for the specimen(s) to be tested and results reported. Employees with negative results may return to work and will receive any pay withheld during the time required for the results to be reported.

Post-Accident Drug and Alcohol Testing

- Post-Accident NONDOT Drug and Alcohol Testing will be conducted if the employee's performance either contributed to an accident or cannot be completely discounted as a contributing factor.
- An accident is defined as an event resulting in physical damage to a person, equipment or facilities.

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- The decision not to test must be based on the employer's determination that, using the best information available at the time of the determination, the employee's performance could not have contributed to the accident.
- Circumstances where Post-Accident testing may occur include but are not limited to the following:
 - The accident resulted in a fatality.
 - The accident resulted in substantial property damage.
 - The accident involved a motorized or powered vehicle lift and occurs during work time, or on Company property, or while in a Company vehicle (including leased or rented vehicles).
- Except where medical assistance takes priority, testing must be accomplished as soon as possible following determination of an accident.
- The alcohol test should be performed as quickly as possible from the time of determination to test.
 - If not performed within 2 hours, the determining supervisor/department officials must prepare and maintain on file a record stating why the test was not properly administered.
 - If not performed within 8 hours, the attempts to administer the test must cease and the record must contain the reasons for not administering the test.
- The drug screen should be performed as quickly as possible from the time of determination to test.
 - If not performed within 8 hours, the determining supervisor/department officials must prepare and maintain on file a record stating why the test was not properly administered.
 - If not performed within 32 hours, the attempts to administer the test must cease and the record must contain the reasons for not administering the test.
- Any employee who leaves the scene of the accident without justifiable explanation prior to submission to drug and alcohol testing will be considered to have refused the test. All employees involved in the incident must be readily available for testing. Management must always be aware of their location. Additionally, documentation must be submitted to the Human Resources Department concerning the incident.
- Any employee who is subject to Post-Accident testing must refrain from consuming any alcohol for eight hours after the accident, unless the

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employee has taken the Post-Accident test required by this policy or has been informed by the Company that no Post-Accident testing will be required.


- Failure to report an accident and/or refusal to submit to a Post-Accident test may result in disciplinary action, up to and including termination.
- *AAR reserves the right to conduct NONDOT testing for DOT/FAA covered employees as set forth in this policy in situations where the accident fails to meet the FAA/DOT Post-Accident testing criteria.*

Return To Work Drug and/or Alcohol Testing

- Upon approval and after completion of the program prescribed by the Employee Assistance Program (EAP), the employee may return to work only after passing a NONDOT Return to Work drug and/or alcohol test.
- All NONDOT Return to Work drug tests will be conducted under direct observation procedures.
- A positive result or refusal to submit to testing will subject the employee to disciplinary actions, up to and including termination.

Follow Up/No Notice Drug and/or Alcohol Testing

- Any employee who has passed a NONDOT Return to Work drug and/or alcohol test and has returned to work following a disclosure of a drug and/or alcohol problem and that has completed the EAP recommended treatment will be subject to NONDOT Follow Up or 'No Notice' testing.
- It is intended to be both a tool of recovery and a deterrent to alcohol/drug use for employees returning to work and who have accepted a management contract for continued employment.
- The number, type and frequency of the tests will be determined by the EAP.
- Testing will be conducted for a minimum of twelve months.
- All NONDOT Follow Up/No Notice drug tests will be conducted under direct observation procedures.

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- A positive result or refusal to submit to testing will subject the employee to disciplinary actions, up to and including termination.

G. COMPLIANCE WITH THE DRUG-FREE WORKPLACE ACT


To protect the safety and health of employees, the Company presents a Drug-Free Awareness Education Program to all supervisors and employees on a periodic basis. This education program presents information on the dangers of drug abuse in the workplace, the availability of counseling and treatment through the Company's EAP, and the penalties for violating this policy.

- All employees working on projects covered by the Drug-Free Workplace Act or other federal or state contracts, laws or regulations will be given a copy of this policy and required to notify the Company of any conviction for violation of a criminal drug statute in the workplace within five days.
- In turn, the Company will notify the contracting agency of the employee's conviction for violation of a criminal drug statute in the workplace within ten days.
- Employees convicted of violating criminal drug statutes in the workplace are removed from the workplace, referred to the EAP, and/or disciplined, up to and including termination.

H. ADDITIONAL REQUIREMENTS

Any employee convicted of a violation of a criminal drug statute must notify his/her supervisor or personnel representative within five days of any such conviction.

At the request of management, based on suspicions or evidence of a violation of this policy, employees must submit to a personal search and/or search of any personal article or vehicle brought on Company premises or worksites or possessed while on Company business, or a search of items within the employee's work area, except as prohibited by applicable law. Any substance found in an employee's possession that violates this policy may be seized by management. Refusal to submit to a search may result in disciplinary action, up to and including termination. An employee may be required to furnish a

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physician's name and/or prescription for confirmation of the prescription of a legal substance found in the employee's possession.

This policy does not prohibit the lawful and appropriate use of legal drugs. However, use of any drug that might make the employee unfit for duty can pose a significant risk to the safety of the employee and others. In addition, misuse of any legal drug can pose a significant risk of safety to the employee and others. Accordingly, all employees must report to the Human Resources Department any use of any legal drug that might make the employee unfit for duty by impairing physical or mental functioning. The Company can then determine whether to allow the employee to work while taking the drug. This includes but is not limited to use of:

- such drugs, prescription painkillers or over-the- counter cold remedies that may cause drowsiness.
- synthetic or herbal drugs that have effects like Prohibited Drugs but are not themselves unlawful.


It is the employee's responsibility to determine from the employee's physician whether use of the drug might make the employee unfit for duty, and the employee may be required to provide a written medical authorization from a licensed physician approving the employee to work while using the drug. However, the Company is not bound by such authorization and may make its own determination regarding the safety of working while using the drug, with or without obtaining its own medical opinion.

I. SELF DISCLOSURE

Any employee who has a problem with drugs and/or alcohol is encouraged to seek assistance by contacting the Human Resources Department. Any employee who comes forward and discloses having a drug and/or alcohol problem and wishes to seek treatment will be given a personal leave of absence of a reasonable length as determined by the Company without pay to enter an appropriate, medically supervised rehabilitation program through the Company's Employee Assistance Program.

An employee will not be given an opportunity to do so if the request:

- comes after an employee has been notified that they must be tested.

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- the Company has knowledge of the employee's prohibited drug use.
- the employee has tested positive for drugs and/or alcohol while at work.
- the employee refuses to submit to testing.

An employee who has been given the opportunity to go to rehabilitation under the foregoing provision must complete the treatment recommended by the EAP counselor/provider.


Upon completion of the program, the employee may return to work only after passing a NONDOT Return to Work drug and/or alcohol test.

In addition, the employee must agree to be subject to unannounced NONDOT Follow Up or 'No Notice' drug and/or alcohol testing for a minimum of twelve months after returning to work.

All NONDOT Return to Work and Follow Up drug tests will be conducted under direct observation procedures.

Subject to the foregoing, disciplinary action in progress at the time the employee discloses the drug and/or alcohol problem and seeks treatment through the EAP will be suspended upon successful completion of the rehabilitation, and the employee will be permitted to work without further disciplinary action. However, such incidents and violation of policy may be taken into consideration in determining disciplinary action in connection with any subsequent performance deficiencies or violations of Company policy.

A positive result or refusal to submit to testing will subject the employee to disciplinary actions, up to and including termination.

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J. MISCELLANEOUS

Certain states have state-specific legal requirements relating to drug and/or alcohol testing. To the extent applicable and to the extent contrary to the provisions herein, such state-specific legal requirements will apply.

Subject to applicable law, AAR will make reasonable accommodations with respect to its drug and alcohol policies and procedures for qualified individuals with a disability, to the extent such reasonable accommodations do not create an undue hardship.

If any portion of this policy conflicts with any federal, state or local law, the law will supersede that portion of this policy.

If any provisions of this policy are voided by the action of a proper authority, any remaining provisions shall continue to be in effect.


This policy supplements the DOT/FAA Drug and Alcohol Policy, the Company's Code of Conduct and other Company policies. If there is a separate basis for discipline under any other Company policy, even if the basis is associated in some way with drugs or alcohol, the Company may continue to pursue disciplinary action under the other policy regardless of this policy.

This policy is not a contract or promise of employment. The Company may amend, withdraw, modify, or add to this or any other Company policy when deemed appropriate or required by law.

K. INFORMATION CONCERNING DRUG AND ALCOHOL

Effects of Drugs and/or Alcohol Misuse on an Individuals Health, Work, and Personal Life

Co-workers who misuse drugs and/or alcohol affect everyone. Studies show that substance abusers are far less productive, miss more workdays, are more likely to injure themselves or someone else, and file more workers compensation claims.

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The measurable dollar costs of workplace substance abuse from absenteeism, overtime pay, tardiness, sick leave, insurance claims, and workers compensation can be substantial. However, the hidden costs resulting from diverted supervisory and managerial time, friction among workers, damage to equipment, and damage to the company's public image mean that workplace substance abuse can further cut profits and competitiveness.

Drug and/or alcohol abuse/misuse can destroy relationships, lead to serious problems with the law, and even cause harm to the people you love.

If substance abuse affects your work life, it could lead to job loss and all the financial problems that would follow.

Drugs

Drugs are chemicals that affect the body and brain. Different drugs can have different effects. Some effects of drugs include health consequences that are long-lasting and permanent. They can even continue after a person has stopped taking the substance.


All misused drugs affect the brain. They cause large amounts of dopamine, a neurotransmitter that helps regulate our emotions, motivation and feelings of pleasure, to flood the brain and produce a "high".

Eventually, drugs can change how the brain works and interfere with a person's ability to make choices, leading to intense cravings and compulsive drug use. Over time, this behavior can turn into substance dependency, or drug addiction.

Signs and Symptoms of a Drug Problem

Any one or more of the following signs may indicate a drug problem:

- paranoia
- aggressiveness
- hallucinations
- addiction
- impaired judgment

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- impulsiveness
- loss of self-control
- missed work
- family or social problems
- job or financial difficulties
- breaking the law

Alcohol

Alcohol is a central nervous system depressant. Taken in large quantities, it causes not only the euphoria associated with "being drunk" but also adversely affects your judgment, your ability to think and your motor functions. Drink enough alcohol fast enough and it can kill you.


Long-term overuse of alcohol can cause liver damage, heart problems, sexual dysfunction and other serious medical problems.

In some cases, alcohol use can lead to physical and psychological dependence on alcohol. Alcoholism is a serious chronic disease. Left untreated it will inevitably get worse.

Signs and Symptoms of an Alcohol Problem

Any one or more of the following signs may indicate a drinking problem:

- family or social problems caused by drinking
- job or financial difficulties related to drinking
- loss of consistent ability to control drinking
- "blackouts" or the inability to remember what happened while drinking
- distressing physical and/or psychological reactions if you try to stop drinking
- a need to drink increasing amounts of alcohol to get the desired effect
- marked changes in behavior or personality when drinking
- getting drunk frequently
- injuring yourself or someone else while intoxicated
- breaking the law while intoxicated
- starting the day with a drink

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L. INTERVENING WHEN A DRUG OR ALCOHOL PROBLEM IS SUSPECTED, INCLUDING CONFRONTATION, REFERRAL PROGRAM, AND /OR REFERRAL TO MANAGEMENT

Why You Should Get Involved

There are three good reasons why you should be concerned if any of your co-workers are using drugs or alcohol on the job:

- You and your co-workers' health and safety may be at risk.
- Alcohol misuse costs you money.
- Alcohol creates a negative work environment.

Co-workers who misuse alcohol don't function at their full potential. Not only is absenteeism a problem, when they are at work these co-workers may have reduced capabilities and productivity. Since our product is the safe transportation of the public, alcohol misuse is an especially serious issue.


No matter what your position is in the company, there are things that you can do to ensure that drug and alcohol use on the job never becomes a problem at AAR. Acceptance of any misuse puts you, this company, and the public at risk.

Sources of Help for Resolving a Substance Abuse Problem

AAR's Employee Assistance Program

AAR provides an Employee Assistance Program (EAP) which provides confidential assistance for coworkers/family members who may be experiencing a problem with alcohol or drugs. The EAP can help assess the problem and refer to a treatment resource(s) best suited to individual needs.

If you have any personal problems or questions concerning drug abuse and need to confide in an EAP or Substance Abuse Professional (SAP), you are encouraged to contact your HR Representative.

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Types of Treatment

Outpatient programs exist in a variety of settings:

- Community mental health centers
- Family service agencies
- Private physicians' and therapist's offices
- Specialized alcoholism and drug treatment facilities

Inpatient services, designed for those with more serious alcohol problems, can be found in:

- Hospitals
- Residential care facilities
- Community halfway houses
- Some alcoholism clinics

Your local phone directory will list helpful referral organizations such as:

- Local council on alcoholism
- Alcoholics Anonymous
- Community alcoholism, drug or mental health clinic
- County medical society