Pre-Employment Drug Testing Policy
Effective: September 1, 2012

Sysco (the “Company”) recognizes that drug and alcohol abuse among its employees, both in the workplace and off the job, are subjects of immediate concern. It is well recognized that the illicit use of drugs and the abuse of alcohol, whether on or off the job, may adversely affect an employee’s judgment and job performance, even after the individual believes the effects to have worn off; jeopardize the safety of that employee, other employees, and the public; and undermine the Company’s operations and public confidence in Company services.

Therefore, the Company has determined that it is necessary to maintain a workplace that is free from the negative effects of drug and alcohol abuse. To ensure that these objectives are met, the Company is implementing a Drug and Alcohol Free Workplace Program. It is the Company’s desire and goal that through the implementation of the provisions of this Program, the employees will be provided with a safer and more desirable place to work and that the Company’s customers receive superior and uncompromised service.

This Pre-Employment Drug Testing Policy [“Policy”] is one of many elements contained within the Company’s overall Drug and Alcohol Free Workplace Program. Additional drug and alcohol related policies may apply, and will be distributed separately.

This Policy applies to all applicants, including applicants who are also covered by and subject to U.S. Department of Transportation and Federal Motor Carrier Safety Administration Regulations. Individuals covered by both policies must comply with both policies.

All applicants will be provided with a copy of this Policy upon request at the time they receive a conditional offer of hire.

PRE-EMPLOYMENT CONTINGENCY

All offers of employment will be made contingent upon satisfactory completion of a pre-employment drug screen. A positive test result, or refusal to cooperate, will result in the denial of employment. Applicants who have been denied employment through violation of this Policy will not be permitted to apply for positions within the Company for one year after being notified that the employment offer is revoked. The ability to reapply in no way guarantees that an applicant will be offered a position.

Refusal to Cooperate

“Refusal to Cooperate” means to obstruct the collection or testing process; to submit an altered, adulterated, or substitute sample; to fail to show up for a scheduled test; to refuse to complete the requested drug testing forms; or fail to promptly provide specimen(s) for testing when directed to do so, without a valid medical basis for the failure.

Illegal Drugs

“Drugs” under this Policy means any controlled substance as defined in Schedules I through V of Section 202 of the Controlled Substances Act, 21 U.S.C. § 812. The term "illegal drug" includes any drug the possession or use of which is illegal under federal, state, or local law,
including “medical marijuana” as well as prescription medications not used by the person for whom prescribed or used in a manner other than prescribed. The Company may test for the presence of some or all of the following classes of drugs: amphetamines (including methamphetamine, MDMA (ecstasy), MDA, and MDMA), cocaine (including “crack” cocaine), opiates (codeine, morphine, heroin, oxycodone), marijuana (THC, “weed,”) phencyclidine (PCP, “angel dust”), benzodiazepines (Valium, Xanax, Klonopin), barbiturates (Darvon), methadone and methaqualone (“Quaaludes”).

**Prescription Medications**

The use of any prescription medication for which the applicant does not hold a valid prescription or used in a manner other than as prescribed is illegal, and will not invalidate or excuse a positive drug test result. Even in states that have decriminalized the use of marijuana for individuals with qualifying medical conditions as a matter of state law, the use of marijuana remains illegal as a matter of federal law. In accordance with the Federal Drug-Free Workplace Act of 1988, the Company has adopted and advanced a policy prohibiting illegal drug use by its employees. The Company will not, therefore, accept a prescription for ‘medical marijuana’ as a legitimate medical excuse for a positive test result. DOT drivers should not use any drug, even by prescription, unless the drivers’ physician has affirmatively assured the driver that it will not affect the ability to drive safely, in accordance with DOT regulations.

**PRE-EMPLOYMENT DRUG TESTING AND COLLECTION PROCEDURES**

**Consent to Testing; Right to Refuse to Be Tested and Consequences**

Testing will not be conducted under this Policy without the consent of the person being tested. Applicants have the right to refuse to submit to drug testing under this Policy. However, the Company will withdraw a conditional offer of employment extended to any applicant who refuses to submit to a lawful pre-employment drug test.

**Specimen Collection**

When an applicant is directed to undergo drug testing, the applicant shall report to a certified collection facility for specimen collection, as designated by the Company. The collection staff collecting samples and the Company’s laboratory will follow chain-of-custody procedures. Specimen collection and chain-of-custody procedures involving specimen transportation will ensure that specimen security, proper identification, and integrity are not compromised. Specimen collection will be performed under reasonable and sanitary conditions. Specimens will be collected and tested with regard to the privacy of the applicant being tested. However, collection will be conducted in a manner reasonably calculated to prevent substitutions or interference with the collection and the testing of reliable samples.

**Laboratory Testing**

Drug testing will be conducted by a laboratory selected by the Company that is certified, licensed or accredited in accordance with applicable law. All testing performed by the Company or at the Company’s direction will conform to scientifically accepted analytical
methods and procedures. Testing will include confirmation of any positive test result by gas chromatography-mass spectroscopy or an equivalent scientifically accepted method of equal or greater accuracy before the result of any test will be used as a basis for refusing to hire an applicant.

The Company will maintain a record of the chain of custody of the sample.

**Medical Review Officer Review**

A Medical Review Officer (MRO) is a licensed physician hired by the Company who is responsible for receiving and reviewing laboratory results generated by the Company’s testing program and evaluating medical explanations for certain drug test results. The Company’s MRO will review all confirmed positive specimens and offer the applicant the opportunity to demonstrate that the positive result cannot be attributed to the legitimate use of prescription medication or to some other valid explanation. In the event the MRO determines that the circumstances leading to a positive test result were other than conduct prohibited by this policy, the test will be verified and reported to the Company as negative.

Following a “negative dilute” result, the applicant will be required to undergo another test. Should this second test result in a negative dilute result, the test will be considered a negative and no additional testing will be required unless directed to do so by the MRO.

**Applicant Rights Following A Confirmed Positive Test Result**

If a confirmation test yields a positive result, the test result will be a "confirmed positive" and the Company’s MRO will provide notice of the confirmed positive test result to the applicant. Within 3 working days following notice of a positive test result, the applicant may explain the test result by disclosing any over-the-counter or prescription medications taken or other medical information to the Medical Review Officer. The applicant may also, within 5 days after receiving notice of a confirmed positive test result, have a second confirmatory test (a "confirmatory retest") conducted on the same sample. Any confirmatory re-test requested by the applicant (and costs associated with such re-test) will be conducted or incurred at the sole expense of the applicant.

**Compliance with All Applicable Laws**

The Company will implement this Policy in a manner that complies with relevant federal, state, and local law. If the terms of this policy differ from that of any applicable law, the Company will comply with that law.

**Confidentiality**

All records relating to positive test results and medical information revealed to the Company and/or its MRO shall be kept confidential, and disseminated within the Company only on a need-to-know basis. Medical records will be kept in secure files separate from personnel files. Test results will not be released outside the Company without the written consent of the tested individual, except as may be required by law or legal process.