



## Background Check and Drug and Alcohol Testing Policy for Contingent Workers, Contractors and Consultants

Effective Date: 06.30.20

### PURPOSE

This Policy defines the Background Check and Drug and Alcohol Testing requirements for Contingent Workers, Contractors and Consultants engaged by Ameren Services Company and its affiliated companies (collectively, "Ameren") to perform services at any Ameren facility, property or worksite, whether physically or remotely.

### SCOPE

#### Background Checks

- Requirements:
  - Background checks: To the extent permitted by law, each Current Employer shall have performed background checks meeting the minimum standards set forth below on all personnel subject to this Policy. The Current Employer shall ensure that the results of all such background checks provide no indication that the individual is unable to safely or effectively perform the specific services assigned.
  - Additional background checks: In addition, each Current Employer shall perform such additional background checks and/or background check updates (each of which may exceed the minimum standards set forth below) as may be required by: (1) applicable law or (2) Ameren, in each case, as a condition to granting access to sensitive or protected areas, sites, or systems.
- Minimum Standards: criminal background check for the immediately preceding seven (7) years, employment verification, and education validation
- Records. Each Current Employer is responsible for maintaining background check results for all of its applicable personnel.

#### Drug and Alcohol Testing

- Requirements:
  - Drug Testing: To the extent permitted by law, each Current Employer shall have performed drug testing meeting the minimum standards set forth below on all personnel subject to this Policy.
  - Reasonable Suspicion Testing. Ameren may, in its sole discretion, require drug and/or alcohol testing of any Contingent Worker or Contractor or Consultant personnel subject to this policy: (1) for reasonable cause based on observations by Ameren or the Current Employer (including, without limitation, any violation of Ameren's Rules to Live By); and (2) after any accident or incident that involves injury to persons or damage to property and for which drug or alcohol use could reasonably be a contributing factor.
  - Additional Contractor Drug and Alcohol Testing Requirements. Each Contractor shall have and implement a policy requiring pre-mobilization drug and alcohol testing on all personnel assigned to perform construction or other physical work at any Ameren owned or controlled facility, property, or worksite. Contractor's policy shall also provide for random and "for cause" drug and alcohol

- testing of personnel while present at such Ameren location and shall meet each of the other requirements of Ameren's Contractor Drug Testing and Substance Abuse Policy (ADM3207).
- Refusal. In the event a Current Employer or any applicable personnel refuse any drug or alcohol test required under this Policy, each such person's access to Ameren property and systems will be immediately terminated and they shall not be permitted to perform future services or work for Ameren without Ameren's prior written consent.
  - Minimum Drug Test Requirements: Negative results on a five (5) panel test, except as required by law (i.e., DOT), Ameren policy or contract.
  - Records. Each Current Employer is responsible for maintaining drug and alcohol test results for all of its applicable personnel.

## **PERSONS AFFECTED**

- This policy applies to all Contingent Workers, Contractors, Consultants, and each of their respective employees, subcontractors and sub-consultants, engaged to perform services at any Ameren owned or controlled facility, property or worksite, whether physically or remotely, except the Callaway Energy Center (CEC). The CEC has separate policies governing background checks and drug testing requirements for Contingent Workers, Contractors and Consultants.

## **DEFINITIONS**

**Consultant** – means a third party entity (other than a Contractor) engaged by Ameren to perform services as an independent contractor at any Ameren facility, property or worksite, whether physically or remotely. "Consultant" includes each of Consultant's subcontractors, sub-consultants and all other non-Ameren personnel employed by any of them. Consultant personnel are issued a badge type of Q.

**Contingent Worker** – An individual engaged to perform services for Ameren on a direct basis but in temporary capacity through, and as an employee of, a third-party staff augmenting company, such as Guidant, and not as an employee of Ameren. Contingent Workers are issued a badge type of Q.

**Contractor** – means a third party entity engaged by Ameren to perform construction-related or other physical work on or near facilities, property, or worksites owned or controlled by Ameren. "Contractor" Includes each of Contractor's subcontractors and all other non-Ameren personnel employed by any of them. Visitors and delivery drivers are excluded. If badged, Contractor personnel are issued a badge type of O.

**Current Employer** – The Contractor, Consultant or other vendor responsible for the employment of an individual subject to this Policy.

## **ENFORCEMENT & AUDIT**

Any individual who violates this Policy, refuses to submit to any requirement, falsifies information related to the requirements of this Policy (including, without limitation, submission of false samples or reports, or tampering with drug or alcohol tests or results), may not perform work or services for Ameren. If such individual has already been engaged as a Contingent Worker or as Contractor or Consultant personnel, Ameren may bar such individual, as well as his or her Current Employer, from Ameren property and/or terminate their engagement.

Each Contingent Worker's, Contractor's and Consultant's compliance with this Policy shall be subject to audit in accordance with the terms of the applicable contract with Ameren. In the event the contract is silent with respect to Ameren's ability to audit such compliance, then Ameren shall have the right to audit compliance at all reasonable times. Audits will be conducted in accordance with the applicable contract.

**EXCEPTIONS AND REPORTING**

Exceptions to this policy require a completed **Background Check and Drug Screen Policy Deviation Form**, which will be signed by the business line leader, reviewed by Corporate Security and approved by the VP, Corporate Security (or designee).

All Ameren employees, Contractors and Consultants are responsible for immediately reporting any known violations of this Policy to an appropriate Supervisor, Manager, or to Corporate Security. Violations can also be reported anonymously through Ameren's Corporate Compliance hotline program which can be reached by calling 1-866-294-5492.



**CORPORATE RESPONSIBILITY**

Corporate Security owns this Policy.

**RELATED DOCUMENTS**

- Alcohol and Drug Policy
- Background Check and Drug Screen Policy Deviation Form
- Contingent Worker Policy
- Callaway Fitness for Duty Policy (POL0044)
- Callaway Fitness for Duty Program (APA-ZZ-00908)
- CIP Personnel Risk Assessment Procedure (AMN-ADM-3041)
- Contractor Drug Testing and Substance Abuse Policy (ADM3207)

**Authorization**

| <b>Owner</b>  | <b>Sponsor</b>  | <b>Approval</b>  |
|---|---|--|
| Terry Roberds<br>Director, Corporate Security                                       | Tim Reagan<br>Vice President, Corporate Security & Crisis Management                | Tim Herrmann<br>SVP, Corporate Safety, Security & Operation Oversight                |
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| X   | X   | X  |
| Date 06.15.2020   | Date 06.15.2020   | Date 06.15.2020  |