

Drug and Alcohol Free Workplace Policy

A safe, substance free operating environment

DOCUMENT REFERENCE

FLG-POL-005

REVISION

1

ISSUE DATE

04 February 2026

POLICY OWNER

Health, Safety and Environment Lead

APPROVED BY

Jorge O. Freig Carrillo, Chief Executive
Officer

NEXT REVIEW

February 2027

1. Purpose

Our people operate commercial vehicles, container handling equipment and regulated cargo on public roads and on client sites. Impairment in that environment endangers life. This policy sets a zero tolerance standard and the testing and support arrangements that enforce it.

2. Scope

This policy applies to every entity, facility, employee, officer, temporary worker and contracted third party operating under the Freig Logistics Group name, including Nogales Transportation Services, LLC and every affiliated transportation, customs brokerage and warehousing company within the group. It applies at all owned and leased facilities in the Arizona and Sonora corridor and on every lane managed on behalf of a client, on both sides of the United States and Mexico border.

3. The Standard

Freig Logistics Group operates a zero tolerance standard. No person may perform any safety sensitive function, enter any operational facility or enter any client site while impaired by alcohol, illegal drugs or the misuse of any other substance.

4. Prohibited Conduct

1. Reporting for work, remaining at work or entering a client site while under the influence of alcohol or any prohibited substance.
2. Consuming alcohol or any prohibited substance during working hours, during breaks, or within the period before duty defined in the supporting procedure.
3. Possessing, distributing, selling or manufacturing alcohol or prohibited substances on company property, in company vehicles or on client sites.
4. Refusing, obstructing, delaying or attempting to adulterate any required test. A refusal is treated as a positive result.
5. Failing to disclose the use of any prescription or over the counter medication that carries a known risk of impairment before performing a safety sensitive function.

5. Regulatory Framework

- 49 CFR Part 40, the United States Department of Transportation procedures for workplace drug and alcohol testing programs.
- 49 CFR Part 382, the Federal Motor Carrier Safety Administration controlled substances and alcohol use and testing rules for commercial driver license holders, together with mandatory queries of the FMCSA Drug and Alcohol Clearinghouse.

- Arizona Revised Statutes Title 23, Chapter 2, Article 14, including section 23-493.04, governing drug and alcohol testing by employers in Arizona.
- Mexican Federal Labor Law and the fitness for duty and rest provisions of NOM-087-SICT-2-2024, enforced by SICT and by the National Guard at roadside.
- MSHA requirements and client site standards where these apply, including the drug and alcohol standard of any mine site or industrial site we enter, which takes precedence wherever it is more stringent than our own.

6. Testing Program

Testing is conducted by a qualified collection site and a certified laboratory, with results reviewed by a Medical Review Officer where the applicable regulation requires one. The program includes the following categories.

- Pre employment testing before any safety sensitive appointment.
- Random testing at the rates set by the applicable regulation, using an unbiased selection method.
- Post accident testing within the timeframes set by 49 CFR Part 382 following any qualifying event.
- Reasonable suspicion testing where a trained supervisor documents specific observations of appearance, behavior, speech or body odor.
- Return to duty and follow up testing where a person is permitted to resume safety sensitive work after a violation.

7. Daily Fitness for Duty Checks

In addition to the testing program, a documented fitness for duty check is completed with every driver at the start of every shift. Where a client site requires it, drivers are also checked for alcohol on entry to the site before loading. Any driver who does not pass a check is stood down immediately and does not drive.

8. Prescription and Over the Counter Medication

Employees are not required to disclose a medical condition. They are required to disclose, before performing a safety sensitive function, that they are taking a medication that may impair their ability to do so safely, so that temporary alternative duties can be arranged. Disclosure is handled confidentially.

9. Support and Self Referral

Any employee who recognizes a substance problem is encouraged to come forward before it results in a violation. A voluntary self referral made in advance of a test or an incident will be handled supportively and confidentially, with access to assistance and a structured return to work where appropriate. Self referral does not excuse a subsequent violation.

10. Consequences and Records

A confirmed positive result, a refusal or any other violation results in immediate removal from all safety sensitive duties and is a disciplinary matter that may result in dismissal. For contracted drivers it results in permanent removal from Freig Logistics Group work. Test records are held securely, separately from general personnel files, released only to those with a lawful need to receive them, and retained for the period required by the applicable regulation.

11. Review

This policy is reviewed at least annually and following any regulatory change or serious incident.

Approved and issued by

Signature and date

Jorge O. Freig Carrillo
Chief Executive Officer
Freig Logistics Group
