

Purpose To provide a safe, healthy and productive work environment, free of alcohol and drugs.

Scope All H.B. Fuller employees, globally. This policy does not apply where it is superseded by local legal requirements or a collective bargaining agreement.

H.B. Fuller will comply with applicable country and local laws and regulations that apply to drugs and alcohol in the workplace, including applicable laws and regulations regarding medical leave and anti-discrimination. H.B. Fuller will enforce this policy and conduct the substance abuse testing as described except where expressly prohibited from doing so by applicable statute, sovereign law, or regulation. Please consult your Human Resources representative for any clarifications

Policy H.B. Fuller is committed to providing a workplace that is free of alcohol and drugs. Our goal is to maintain a safe, healthy and productive work environment for our employees. H.B. Fuller's Drug and Alcohol policy supports this commitment. Compliance with this policy is a condition of employment for all present and future employees. If you have any questions about the policy, please contact your supervisor or a Human Resources representative.

Standards of Conduct

The following standards of conduct help H.B. Fuller establish a safe, healthy and productive work environment in which employees are physically and psychologically fit to perform their duties. Violations of these standards of conduct may result in disciplinary action up to and including termination of employment.

Definitions

Workday: any period of time when a H.B. Fuller employee is working for or representing H.B. Fuller, or when non-H.B. Fuller personnel are working on behalf of H.B. Fuller. This includes personal time such as lunch and other breaks.

Workplace: H.B. Fuller property, including H.B. Fuller motor vehicles, or any place where H.B. Fuller work is being performed off of H.B. Fuller property.

H.B. Fuller events: H.B. Fuller sponsored business events or social functions, such as holiday parties, management forums, picnics or sports events.

Drug: any substance used outside of prescribed medical direction for the primary purpose of altering moods, behavior, consciousness, or performance. Drugs may include but are not limited to, non-prescription inhalants, prescription medications without a valid prescription, marijuana and other illegal drugs. This definition excludes commonly consumed food such as chocolate and caffeinated beverages.

Alcohol: any fermented or distilled beverage containing ethanol, which includes but is not limited to any alcoholic drink such as hard liquor, wine, and beer.

Employee Assistance Program: H.B. Fuller's Employee Assistance Program

(EAP) where available, or, if not available, a treatment or rehabilitation program acceptable to H.B. Fuller.

Adulterants: substances used in an attempt to taint samples so test results are inaccurate.

Adulterated Specimen: a specimen that contains a substance that is not expected to be present in human urine or saliva, or contains a substance expected to be present but is at a concentration so high that it is not consistent with human urine or saliva.

Substituted Specimen: a specimen with creatinine and specific gravity values that are so diminished that they are not consistent with human urine or saliva.

Reasonable Suspicion: a basis for forming a belief based on specific facts and rational inferences drawn from those facts. For example, reasonable suspicion of drug or alcohol use may be based on any of the following factors: appearance, behavior, speech, attitude, mood or odor of an individual; or possession of an open bottle of liquor or alcohol or drug paraphernalia.

Prohibited Drugs

During the workday, in the workplace, or at H.B. Fuller events, H.B. Fuller prohibits:

- use, possession, buying, or selling of illegal drugs;
- possessing of drug paraphernalia;
- being under the influence of illegal drugs while at work. "Under the influence" means having illegal drugs in your system at detectable levels in a regionally, appropriate drug test.
- sharing, buying or selling of prescription medications in the workplace;
- use or possession of prescription medicines without a valid prescription; and
- use of non-prescription inhalants.

Responsible Use of Prescription and Over-the-Counter Medications

When employees use prescription or over-the-counter medications that may cause safety risks or security risks for employees or Company assets (e.g. drowsiness, blurred vision, coordination problems, confusion, disorientation, etc.), they are encouraged to confer with their physician regarding the employee's fitness for duty while taking the medications. The employee must inform his or her supervisor of any safety considerations. (The employee is not expected to disclose specific medications or medical conditions). If there is a concern that the employee may not be able to perform his or her job duties in a safe, effective and productive manner, the employee may be, if feasible, reassigned to other duties while taking

the medication. Employees will not be disciplined for reporting concerns related to the valid use of prescription or over-the-counter medications.

Alcohol Use

H.B. Fuller prohibits:

- the use of alcohol during the workday, in the workplace, or any time when H.B. Fuller business is being conducted, except as set forth under the “Responsible Use of Alcohol” section, below;
- selling or buying alcohol in the workplace, and;
- being under the influence of alcohol while at work. “Under the influence” includes, but is not limited to having an alcohol concentration of 0.04% or greater blood alcohol concentration, or its equivalent; or exhibiting signs and symptoms reasonably associated with alcohol intoxication (e.g. slurred speech, staggering gait, odor of alcohol on the breath, etc.).

There are a few well-defined exceptions to these standards as outlined below.

Responsible Use of Alcohol

With prior management approval, alcohol may be served at H.B. Fuller events or on H.B. Fuller property. The use and service of alcohol at H.B. Fuller events or on H.B. Fuller property should comply with the guidelines set forth in this Policy

H.B. Fuller employees may consume alcohol:

- at H.B. Fuller-sponsored events with prior management approval;
- at after-hours business dinners or hospitality suites. When employees are performing their job duties with individuals from either inside or outside H.B. Fuller, there is a need at all times to conduct business in a professional and responsible manner.

In all these instances, H.B. Fuller employees are obligated to be responsible in their use of alcohol. Those who responsibly use alcohol remain professional, sober and safe at all times; they do not in any way compromise the health or safety of themselves or others.

Drug and Alcohol Testing

H.B. Fuller may require an employee to submit to a drug and alcohol test; all such tests will be performed in conformance with applicable law. H.B. Fuller prohibits interference with drug and alcohol tests, which may include substitution, dilution, or the use of an adulterant.

H.B. Fuller employees are expected to comply with required drug and alcohol testing. H.B. Fuller conditional offerees and employees are subject to drug and/or alcohol testing in the following circumstances:

- as a standard part of pre-employment screening for applicants to whom H.B. Fuller has made a conditional offer of employment. H.B. Fuller reserves the right to withdraw a conditional offer of employment from a job applicant who tests positive on a confirmatory drug or alcohol test or who is unable to produce a negative drug or alcohol test result;
- when a government statute or regulation requires it;
- when a reasonable suspicion exists that an employee has likely caused or contributed to a work-related accident where property damage could exceed US\$2,000.
- when a reasonable suspicion exists that an employee is using or has used alcohol or drugs during the workday or at the workplace in violation of H.B. Fuller's policy;
- when a reasonable suspicion exists that an employee is under the influence of alcohol or drugs during the workday or at the workplace in violation of H.B. Fuller's policy.

H.B. Fuller will require employees who it tests pursuant to post-accident and reasonable suspicion testing to provide requested samples as soon as reasonably practical after the Company determines that testing is appropriate.

Positive Drug and Alcohol Test Results

If an initial drug or alcohol test produces a positive result, a second confirmatory test will be conducted on the same sample. If the second test for drugs or alcohol is confirmed positive, the Medical Review Officer will notify the applicant or employee of the test results and offer them an opportunity to explain the test results. The applicant or employee may:

- submit in writing to their supervisor within five (5) working days of the applicant or employee receiving notice of the test report, information such as the lawful use of prescription or non-prescription medications for the purpose of explaining the positive test results, and/or;
- request in writing within five (5) working days of the applicant or employee receiving notice of the test report, that a second test on the original sample

be conducted at a laboratory chosen from a list of certified testing organizations. If the second test is negative, H.B. Fuller will reimburse the applicant or employee for the test.

Employee Discipline and Employment Implications

Appropriate action, up to and including immediate termination of employment, will be taken if an employee tests positive, adulterates or substitutes a specimen, or refuses to take a drug or alcohol test required under this policy.¹

H.B. Fuller may refer evidence obtained to law enforcement agencies when it is appropriate to do so.

Return to Work

Employees suspected of working while under the influence of drugs or alcohol in violation of this policy will be relieved of duties with pay until H.B. Fuller receives the results of a drug and/or alcohol test from the testing facility and any other information H.B. Fuller may require to make an appropriate determination as to any violation of Company policies. If H.B. Fuller is notified of a positive, adulterated, or substituted test result, H.B. Fuller may suspend the tested employee or transfer that employee to another position at the same rate of pay pending the outcome of the confirmatory test and, if requested, the confirmatory retest.

Right to Refusal

Conditional offerees and employees have the right to refuse to undergo drug and alcohol testing under this Policy, however H.B. Fuller will rescind a job offer made to a conditional offeree and will terminate the employment of any employee who refuses to undergo drug testing requested under this Policy.

Labor Relations

Any employees subject to a collective bargaining agreement will be covered by the contract to the extent it applies, including any provisions governing rights of appeal.

Confidentiality

Information obtained in the testing process will be kept confidential and shared only with those who have a need for access to that information except as permitted by law.

¹ H.B. Fuller will apply this section consistent with Minnesota law for Minnesota employees. Minnesota law prohibits an employer from discharging an employee for whom a positive test result on a confirmatory test was the first such result for the employee on a drug or alcohol test unless the employee is given an opportunity to participate in, at the employee's expense or under an employee benefit plan, either a drug or alcohol counseling or rehabilitation program, whichever is more appropriate, as determined after consultation with a certified chemical use counselor or physician trained in the diagnosis and treatment of chemical dependency, and the employee has either refused to participate or has failed to successfully complete the program as evidenced by withdrawal from the program before its completion or by a positive test result on a confirmatory test after completion of the program.

Employee Responsibility

All H.B. Fuller employees are responsible for helping maintain a safe, healthy and productive work environment. It is the responsibility of all employees to ensure that this policy is enforced. H.B. Fuller requires that all employees:

- comply with the H.B. Fuller Drug and Alcohol Policy;
- comply with all applicable laws regarding drugs and alcohol in the workplace;
- report indications of possible policy violations to supervisors;
- not retaliate against anyone who reports or helps confirm a suspected violation;
- report to supervisors any use of a prescription or over-the-counter medication that may impair their ability to safely, effectively and productively perform their job duties, and;
- be responsible in their use of alcohol such that they remain professional, safe and sober at all times and they do not in any way compromise the health or safety of themselves or others.

Employees concerned about a drug and alcohol policy violation, or the safety or well being of coworkers or others, may contact their supervisor or Human Resources. Employees who believe that their supervisor may be impaired or may have otherwise violated the policy's standards of conduct should report their concerns to Human Resources. Retaliation is prohibited against employees who in good faith report a suspected violation on the part of management.

Compliance with the United States Federal Drug-Free Workplace Act (U.S. Employees and employees conducting business in the U.S. only)

As a condition of employment, employees must report any conviction under a United States criminal drug statute for violations occurring on H.B. Fuller premises or while conducting H.B. Fuller business within a state or territory of the United States. A report of a conviction must be made to Human Resources within five (5) days of the conviction. Within ten (10) days of learning about an employee's conviction, H.B. Fuller is required to notify any federal agency with which it contracts or subcontracts of any criminal drug statute conviction.

Outside Resources

Employees currently concerned about their drug and/or alcohol use are encouraged to seek company-sponsored assistance. U.S. employees may contact the H.B. Fuller Company Employee Assistance Program; non-U.S. employees may contact a local provider approved by the Company in the respective country.

Disclaimer

THIS POLICY IS NOT INTENDED TO, AND DOES NOT CREATE A CONTRACT BETWEEN H.B. FULLER AND ITS EMPLOYEES. H.B. FULLER RETAINS ITS RIGHT TO MAKE ANY CHANGES AT ANY TIME BY ADDING TO, DELETING, OR CHANGING THIS POLICY, WITH OR WITHOUT PRIOR NOTICE.

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