

104 – Drug and Alcohol-Free Workplace

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Org:	Human Resources	
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1. APPLICABILITY

- 1.1. This policy applies to all employees of Akima Technical Solutions, LLC, including affiliates, subsidiaries, and successor companies; hereafter referred to as "Akima Technical Solutions, LLC", "Company" or "Akima Technical Solutions, LLC Companies".
- 1.2. This policy also applies to independent contractors, subcontractors, employees from temporary agencies, and others working with the Company in support of its goals and objectives. Such persons/companies will be so informed of the Company's policy at the time of their engagement.

2. PURPOSE

- 2.1. The Company prohibits use of illegal drugs as well as the misuse of drugs (including over the counter medication) and alcohol by employees. In addition to undermining safe, healthy, and efficient working conditions for all personnel, drug and alcohol abuse affects employee qualifications to work under the Company's contracts, and impairs the reputation and integrity of the Company as well as its personnel. Drug and alcohol abuse that is not unlawful may nonetheless raise issues of safety, performance, and liability. The Company is committed to a policy of "zero tolerance". The goal of this policy is to provide maximum discretion to management for preventing substance abuse, subject only to any federal or state laws that clearly limit the Company's discretion.

In accordance with its federal contracts, the Company complies with the federal Drug-Free Workplace Act of 1988. Consistent with that Act, the Company (1) strictly prohibits manufacture, use, possession, sale, purchase, transfer, or being under the influence of illegal drugs at any time on company premises, and (2) requires employees to notify the Company of any criminal conviction for a drug-related violation, within 24 hours of the conviction or as required by the specific contract/project that the employee supports.

This policy is not intended to prohibit lawful use of prescription or over the counter medication, nor is it intended to prohibit moderate consumption of alcohol during travel time or personal time off. However, to the degree that off-duty consumption affects the employee's work, work relationships or the Company's image, or is evident during working hours, the Company will take remedial action.

3. DEFINITIONS

- 3.1. **Drug.** A drug is any substance (including alcohol) that can affect or impair the judgment, reflexes, or mental acuity of a user.
- 3.2. **Illegal Drug.** An illegal drug is any "controlled substance," as defined in Section 802(6) of Title 21 of the United States Code, excluding drugs used pursuant to a prescription valid under federal law or used as otherwise authorized by federal law.

3.3. **Substance Abuse.** Substance abuse is defined as:

- 3.3.1. The use of alcohol or other drugs on or off Company property where usage affects or impairs an employee's ability to do his/her job; or
- 3.3.2. The manufacture, distribution, dispensing, possession, or use of an illegal drug.
- 3.3.3. Intoxication or impairment of a person's ability to do any aspect of his/her job, including operation of Company equipment or vehicles, completion of work products, or appropriate interaction with other individuals in the workplace, as a result of use of a drug, legal or illegal, on or off the job.

3.4. **Reasonable Suspicion.** Reasonable suspicion occurs when someone in the organization observes the behavior of an employee that indicates that the employee may be under the influence of drugs or alcohol. Such observable behaviors could include, but are not limited to: slurred speech, inability to walk straight, incoherent speech, dilated pupils, or other demonstrated, observable behaviors that are clearly outside of acceptable workplace behavior norms.

3.5. **Sensitive Position.** A sensitive position is a) one in which an employee is granted access to information classified at the Public Trust security level or above, b) one the Company determines relates to national security, health or safety, or c) one requiring a high degree of trust and confidence.

4. POLICY

4.1. **General.** A summary of the major elements of the Policy are highlighted below:

- All employees will be provided a copy of the Company's Drug and Alcohol-Free Workplace policy at their time of hire and charged with reading and understanding it.
- Employees will not possess or use alcohol or drugs on Company property at any time or off Company property where usage influences their ability to do their jobs.
- Employees will not manufacture, distribute, dispense, possess, or use illegal drugs (see Definitions) at any time.
- Employees will not use any drug or alcohol in a manner that results in intoxication in the workplace.
- Employees will cooperate in all required testing for drugs and/or alcohol, and comply with the Drug and Alcohol-Free Workplace policy.
- The Company will:
 - Implement an awareness program for all employees regarding the dangers of drugs and alcohol abuse.
 - Train managers to recognize indications of drug and alcohol abuse to objectively conclude whether reasonable suspicion exists to test an employee in accordance with this policy.

- Employees who are convicted of a violation of any criminal drug statute shall notify the Program Manager or Project Manager within 24 hours after the conviction. The Program Manager or Project Manager in turn will immediately notify the Human Resources Department. Failure to provide notice on a timely basis will result in disciplinary action, up to and including termination. The Company will notify the applicable contracting agency within ten (10) days of notice by the employee or receipt of actual notice of conviction.
- 4.2. **Continual Behavioral Observation.** All employee's, particularly managers, are to be observant of behavior that may jeopardize the safety and security of employees or that could affect responsiveness to Company or project requirements, and to report their concerns to management or to their Human Resources Business Partner. When there is reasonable suspicion an employee is under the influence of drugs or alcohol, the Program Manager/ or Project Manager/, Department Head or their management designee shall contact their Human Resources Business Partner to request removal of the individual from the work site, and drug and alcohol testing. Positive test results will result in corrective action up to and including dismissal.
- 4.2.1. Employees who are involved in an accident while operating a company vehicle or machinery may be required by the contract they support to complete a post-accident testing for drugs and/or alcohol.
- 4.2.2. Negative dilute test results will require a second testing. Second testing will be done under observation and if a dilute negative is returned it is considered negative.
- 4.3. **Employees Working on Certain Contracts.** Certain contracts may impose requirements respecting drug and alcohol testing which exceed those referenced herein. The Company will comply with requirements specific to the contract/project. At a minimum, the Company will remove any employee found to be using illegal drugs, pending disciplinary action.
- 4.4. **Disciplinary Action.**
- 4.4.1. **Inappropriate / Illegal Use of Drugs or Alcohol.** Employees who are observed in possession of, test positive for, or are under the influence of drugs or alcohol, or are convicted of violating a criminal drug statute will be subject to disciplinary action, up to and including termination. Such determination must be approved by the Company President or General Manager, and in consultation with the Chief Human Resources Officer and Legal Counsel.
- 4.4.2. **Use of Drugs as Part of a Prescribed Medical Treatment Program.** Employees may not be impaired or intoxicated while on the job or conducting company business. Employees who must take prescribed drugs that result in impairment must consult with their medical providers and cooperate with the Company to eliminate such impairment. As appropriate, such employees may be referred to the Employee Assistance Program or placed on a leave of absence. Employees who are inappropriately or illegally using/ or abusing prescribed medication or controlled substances will be considered to have violated this policy and subject to disciplinary action, up to and including termination.
- 4.5. **Rehabilitation.** Employees, who have a problem with drugs or alcohol, are encouraged to secure treatment by utilizing the company provided Employee Assistance Program or other resources. Self-disclosure by an employee to HR or management for the purpose of securing assistance with such a problem, prior to the employee having any knowledge of an imminent

random test and prior to engaging in any actions that could trigger a post-accident or reasonable suspicion test will not result in discipline. Following self-disclosure, the Company will work with the employee and the employee's treatment provider in furtherance of the employee's treatment program, consistent with the requirements of the employee's job. Such efforts may include but not be limited to the granting of a leave, reassignment, and return to duty / post treatment testing.

Under appropriate circumstances, the Company may require that the employee participate in a drug abuse assistance or rehabilitation program. In order for the employee to return to work or to remain at work after or during rehabilitation, a mandatory fitness for duty statement from an appropriate medical entity and return to duty testing will be required. If the employee has either rejected assistance or demonstrated a lack of serious commitment to overcoming the problem and achieving a satisfactory level of performance, attendance, or behavior; then formal disciplinary action shall proceed. An employee actively involved in an approved treatment program will not be dismissed without the approval of the Company President or General Manager, in consultation with the Chief Human Resources Officer and Legal Counsel.

Participation in a treatment program will not insulate an employee who tests positive for drugs or alcohol as the result of a test performed in accordance with this policy.

- 4.6. **Reinstatement.** Current employees dismissed for failure to comply with any aspect of the Drug and Alcohol-Free Workplace policy will not be considered eligible for re-employment for at least twelve (12) months following the event that caused their dismissal. Rehire of such candidates must be approved in advance by the Chief Human Resources Officer.

5. RESPONSIBILITIES

5.1. **Related responsibilities will be shared:**

- The President & CEO is accountable for ensuring a drug and alcohol-free workplace and for providing an environment conducive to optimum operating efficiency and productivity.
- Each member of management is responsible for executing the tenets of this policy with the employees for whom they are directly responsible.
- The Chief Human Resources Officer and Director of HR Compliance will provide overall guidance, interpretation, and coordination of the implementation of this policy.
- The Human Resources Department will oversee the implementation of this policy, ensuring that all candidates for employment and current employees are informed of its contents, and provide training to managers, as required.

6. PROCEDURES

- 6.1. **Pre-Employment Testing.** All job applicants are subject to pre-employment drug and/or alcohol testing to the extent such testing is required by the contract on which the applicant is to be employed and as required by law or regulations, e.g. employees required to have a Commercial Driver's License and those subject to FAA requirements. Job applicants who refuse to test or test positive for drugs will not be hired.
- 6.2. **Random Testing.** Where required by contract or by law or regulation, e.g. employees required to have a Commercial Driver's License and those subject to FAA requirements, random drug

testing of employees will be performed on a periodic, unannounced basis. Employees subject to random testing must cooperate with such drug testing requirements or be subject to disciplinary action up to and including dismissal. See also section 6.6. below.


- 6.3. **Post-Incident Testing.** Where required by contract or by law or regulation, e.g. employees required to have a Commercial Driver's License and those subject to FAA requirements, employees involved in a work-related accident or incident, as applicable, will be required to complete a drug and/or alcohol test. All work-related accidents or such incidents must be reported immediately, in accordance with the the Company's Health, Safety and Environment manual.
- 6.4. **Reasonable Suspicion Testing.** When there is reasonable suspicion that an employee is or may be using, or is or may be under the influence of drugs or alcohol such employees will be tested for drugs and alcohol.
- 6.5. **Return-to-Duty Testing.** If an employee voluntary discloses their drug or alcohol abuse, the employee will be placed on mandatory leave of absence to obtain a substance abuse evaluation and to participate in and complete a formal treatment program for substance abuse. Prior to returning to duty following successful participation in a treatment program, the employee must take and pass a drug and alcohol test.
- 6.6. **Employees Testing Positive.** Any employee who tests *positive* will be subject to disciplinary action, up to and including dismissal. Employees who refuse to take a drug or alcohol test when so directed or who otherwise interfere with or attempt to thwart the testing process will be deemed to have tested positive and subject to dismissal. In such cases, the Company has no obligation to prove that the employee was in fact impaired, violated Company policy, or that the Company possessed "just cause" or a particular amount of evidence before requesting the test.
- 6.7. **Security Clearance.** Human Resources will notify the Facility Security Officer (FSO) within 24 hours of any employee holding a security clearance whose drug test results are positive. The FSO will make a determination regarding continued access to classified material, and will submit a report to the Defense Industrial Security Office and/or other agencies as required.
- 6.8. **Reinstatement/Rehire.** Employees dismissed for testing positive for drugs or alcohol will not be eligible for consideration of re-employment for a minimum period of twelve (12) months following the date employment is terminated. The Chief Human Resources Officer must review all rehire decisions in advance.
- 6.9. **Files.** Test results and related documentation will be retained in separate files under the control of the Corporate HR Compliance Manager or their designee, and will be limited to those within the HR, Legal, HSE, and Security Departments with "***need to know.***" Those obtaining unauthorized access to these files will be subject to disciplinary action, which may include dismissal.
- 6.10. **Confidentiality.** No reference to alcohol or other drug problems as a medical diagnosis will appear in personnel files. This does not, however, preclude documenting behavior such as slurred or incoherent speech, inability to respond to questions, stumbling, smelling of alcohol, associated lapses in performance, observation of possession or use of alcohol or other drugs, etc.

7. RELATED POLICIES AND PROCEDURES

211 Employment - Performance Improvement/Conduct
212 Employment – Termination of Employment
406 Benefits – Family and Medical Leave Act Leave of Absence (FMLA LOA)
Department of Defense Regulations (48 CFR 223.75 – Drug-Free Work Force)
Federal Acquisition Regulations (Subpart 23.5 – Drug-Free Workplace)
Employee Handbook, Section 10-06, Substance Abuse
Akima Technical Solutions, LLC Code of Conduct
Akima Technical Solutions, LLC Signature Authority Policy and Procedure

8. EXHIBITS

HR-035, Request for LOA Form
Employee Assistance Program (EAP)

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1.0 PURPOSE

To establish drug and alcohol screening guidelines for pre-employment, reasonable suspicion and post accident to ensure the company maintains and fully complies with a drug and alcohol free work environment.

2.0 APPLICABILITY

This procedure is applicable to DynCorp International (DI) LLC, and its majority owned subsidiaries.

3.0 CORE PROCESS

This categorization identifies the owning Core Process, as previously identified by the Enterprise Performance Excellence Quality Systems (QS) Team for review. Go to the GEM for a list of all of the Core Processes & Definitions.

3.1 HR Administration

4.0 SCOPE

The intended audience for this procedure is DI and its majority owned subsidiary employees. Host country labor laws may supersede this procedure. In some cases, a host country specific procedure may be available and apply in lieu of this procedure.

5.0 ROLES & RESPONSIBILITIES


5.1 Employees

- 5.1.1 Avoiding the use or abuse of illegal drugs.
- 5.1.2 Avoiding unauthorized use of alcohol while on customer or company premises or as defined in 4.1.14 Consumption or Use of Alcohol or which may impair the employee while working.
- 5.1.3 Notifying management of any medications which have the potential to impact work performance.
- 5.1.4 Notifying the company of any criminal drug statute conviction -- no later than five (5) days after such conviction.
- 5.1.5 Reporting of observed alcohol or illegal drug use or abuse in the workplace.

5.2 Managers

- 5.2.1 Maintaining a work environment free from employee use, abuse, or being under the influence of illegal drugs or alcohol, including any activity involving the manufacture, sale or distribution of same.
- 5.2.2 Distributing the procedure to or otherwise notifying all employees as to the company's expectations concerning a drug-free workforce.
- 5.2.3 Notifying the responsible Human Resources or Security as appropriate, when an employee has been convicted of violating a criminal drug statute as defined herein no later than five (5) days after receiving notice.
- 5.2.4 Taking prompt disciplinary action if an employee's conduct violates this procedure.
- 5.2.5 Referring employees for treatment through the Employee Assistance Program (EAP) when appropriate.
- 5.2.6 Maintaining the confidentiality of medical information disclosed pursuant to this procedure and, where appropriate obtaining necessary HIPAA certification.


5.3 Human Resources

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- 5.3.1 Informing employees this procedure exists and is available for their review.
- 5.3.2 Maintaining the confidentiality of medical information disclosed pursuant to this procedure and, where appropriate obtaining necessary HIPAA certification. The results of drug tests are maintained separately from personnel files and include the date the drug test was administered.
- 5.3.3 Administration of drug and alcohol testing

6.0 DEFINITIONS

- 6.1 **Company Premises, Company Property, Work Environment and Workplace** - property, facilities, land, offices, buildings, structures, trailers, equipment, automobiles, trucks, vehicles, and parking areas, whether owned, leased, customer furnished, or otherwise under the control of or used by the company. Also included in this definition are other work locations, including the job site of a customer, supplier, subcontractor or associate contractor.
- 6.2 **Controlled Substances** - substances listed on the U.S. Department of Justice, Drug Enforcement Administration, Diversion Control Programs, and Controlled Substance Schedules, as amended. This list can be found at 21 CFR § 1300. Employees are responsible for checking this list and confirming the propriety of any medication or other substance.
- 6.3 **Employee Assistance Program (EAP)** - company sponsored counseling programs offer short-term assessment counseling and referral services to employees for a wide range of drug, alcohol and mental health programs that affect employee's job performance.
- 6.4 **Conviction** - finding of guilt (including a plea of nolo contendere), imposition of sentence, or both by a judicial body charged with the responsibility to determine violations of the criminal drug statutes of any country.
- 6.5 **Criminal Drug Statute** - criminal statute of the United States or the country in which an employee is located involving the manufacture, distribution, dispensation, use, or possession of any controlled substance.
- 6.6 **Hiring Location** - company location from which applicants are selected for job offers and from which job offers are extended.
- 6.7 **Illegal Drugs** - (1) any drug which the sale, use, or possession of, is unlawful in the U.S. and/or the country in which an employee is located, including controlled substances and (2) any other drug used for an improper purpose according to U.S. law and the law of the country in which the employee is located.
- 6.8 **Legal Drug, Prescription Drug and Medication** - drugs prescribed by a person's duly licensed physician and used in accordance with the prescription, and over-the-counter drugs that (1) contain no substances that are illegal drugs as that term is defined in paragraph J above; (2) were legally obtained by the employee; and (3) are being used for the purpose and in the manner for which they were prescribed or manufactured.
- 6.9 **Negative Drug Test** - results of the drug test indicated no presence of a controlled substance or its metabolites in the individual's system.
- 6.10 **On Duty** - employee's regular work hours and all other times an employee spends performing company business, on and off company Premises, including, but not limited to, tasks specified in his or her job description, other assigned tasks, business travel, and break periods. At the designation of a Program Manager, "on duty" may also

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include a specific duration of time in advance of an employee's assigned regular work hours. For overseas employees, on duty includes from the time they arrive and depart their Foreign Service Agreement mission area. It also includes any time an employee is assigned to be on call.

- 6.11 **Positive Drug Test** - results of the drug screening indicating the presence of a controlled substance or its metabolites in the individual's system.
- 6.12 **Under the influence** - employee is affected by a drug, whether legal or illegal, alcohol, or other substance, or the combination of a drug and alcohol, so as to impair or potentially impair the employee's ability to perform his or her job.

7.0 PROCEDURE

Procedure Visual Overview



Procedure Description

7.1 Illegal Drugs


7.1.1 The manufacture, use, sale, trafficking, purchase, transfer, distribution, dispensing, or possession (or conspiring to do any of the foregoing) of any illegal drug, the use of a prescription drug not prescribed for the employee and the distribution of prescription drugs to anyone other than the person for whom the prescription was issued by any employee while on duty or on company premises is prohibited and shall be considered gross misconduct. This misconduct may also subject the individual to criminal prosecution.

7.1.2 The same conduct occurring off company premises or outside of work hours is prohibited. Regardless of time and location, such behavior could adversely affect an employee's work performance, employee security clearance, the safety of other employees, company property, or the company's public image or reputation.

7.2 Medications

7.2.1 In certain situations, an employee's use of a medication can pose a risk to the safety of the employee or to others. If an employee's use of any medication prior to or while on duty or while on company premises could adversely affect the safety of the employee, coworkers, or other persons, the employee's job performance, or safe, efficient company operation, then the employee must provide his or her Human Resources Generalist (HRG) with a physician's notice which specifies any on-duty-related limitations resulting from using the medication. Employees are to notify their HRG in cases where there is any possibility that use of a Medication could affect safety or an employee's work performance. The HRG maintains all documents related to employees' use of medication separately from employee personnel files and will preserve the confidentiality of all medical information provided.

7.2.2 Employees who possess or take any medications, either prescription or over the counter medications, from non-US sources are responsible for ensuring that use and/or

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possession of such medications is lawful under US law and the law of the host country or countries in which they are assigned and complies with this policy.

7.3 Alcohol

7.3.1 The unauthorized use of alcohol by an employee while on duty or the use of alcohol at any time such that the employee reports to work under the influence of alcohol shall be considered misconduct. Also refer to 4.1.14 Consumption & Use of Alcohol

7.4 Searches

7.4.1 With prior approval from either General Counsel, HR SVP or Chief Compliance Officer or their designee, a manager may be authorized (and may authorize others) to conduct a search for illegal drugs, other substances, or unauthorized alcohol on company premises including, but not limited to, company (or customer) provided housing, personal property, parking areas, and employees' vehicles while on company premises. For purposes of this policy, employees shall have no expectation of privacy with respect to their living quarters when such accommodations are provided by the customer or the company. For overseas employees, "premises" is also defined as government or company furnished living accommodations. Searches of employees and their personal property may be conducted when there is reasonable suspicion that an employee is in violation of the terms of this procedure or on a random basis at the reasonable discretion of Company's General Counsel, SVP HR, Chief Compliance Officer, or designee.

7.4.2 Employees are required to cooperate in all authorized searches. An employee's refusal to consent to a search may result in disciplinary action, including termination of employment for cause.

7.4.3 Employees performing assignments on U.S. customer installations or vessels are also subject to the rules and regulations communicated by the customer. These rules and regulations provide that customer security authorities may take actions to prevent the introduction of alcohol, drugs, or related paraphernalia into customer or contractor work areas. These actions may include unannounced, periodic, or routine inspections of work spaces by the customer, random inspections of vehicles on entry or exit with drug detection dog teams to eliminate vehicles as safe havens for storage of or use in trafficking of illegal drugs, and random inspection of personal possessions on entry or exit from the installation.

7.4.4 Employees are expected to cooperate in these investigations.

7.5 Pre-Employment Drug & Alcohol Screening

7.5.1 Satisfactory test results are required prior to an applicant's hire date or deployment date; or otherwise in accordance with management discretion.

7.5.1.1 HR SVP reviews business necessity requests to hire prior to receiving the results.


7.5.2 Applicants disqualified for positive results are eligible for employment consideration after 6 months from the test result notification.

7.5.2.1 Applicants reapplying are required to complete the pre-employment screenings process.

7.5.3 Rehires hired within 30 days from their last termination date do not need to complete a pre-employment drug & alcohol screening

7.6 Random and Reasonable Suspicion Drug & Alcohol Screening

7.6.1 Subject to state and local laws applicable to the work location, each Program Manager may implement a Random Drug and Alcohol Testing Program with the prior approval of

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the responsible HR SVP. Random drug and alcohol testing are required when mandated by the applicable contract.

7.6.2 During the hiring process, employees are required to sign 4.1.12-1 Drug & Alcohol Testing Consent Form as a condition of continued employment. Employees who refuse to execute a consent form or submit to a drug test will be terminated.

7.6.3 Employees shall be selected for testing through an impartial clearly defined random selection method, approved by the responsible HR SVP or his/her designee.

7.6.3.1 Selected employees are given no advance notice of the drug testing requirement.

7.6.3.2 The drug testing shall be conducted in compliance with 4.1.12.1 Administration of Drug & Alcohol Testing.

7.6.4 Employees receiving a positive drug test are subject to disciplinary action up to and including termination of employment.

7.6.4.1 Information obtained from employees as part of a drug test or search is used by the company solely in the administration of this procedure and for no other purpose without the employee's consent, provided the company shall be free to deliver any evidence of a crime to the cognizant authorities and to file any adverse information reports required by federal law and regulation including the National Industrial Security Program Operating Manual.

7.7 If required by applicable customer contract or mandated by other special circumstances, management may implement standards related to the drug and alcohol free work environment that exceed the requirements stated in this procedure. The implementation of these standards shall be reviewed in advance and approved by the HR SVP.

8.0 DOCUMENTS REFERENCED WITHIN

8.1 Procedure(s) (PR)

8.1.14.1.14 Consumption & Use of Alcohol

8.2 Work Instruction(s) (WI)

8.2.14.1.12.1 Administration of Drug & Alcohol Testing

8.3 Form(s) (FO)

8.3.14.1.12.1-1 Drug & Alcohol Testing Consent form


9.0 ATTACHMENTS / EXHIBITS

9.1 None

10.0 REVISION HISTORY

**All prior versions of the document will be found within the Version History of the GEM. To obtain prior versions, email GEMupdates@dyn-intl.com.

Version #	Date Revised / Reviewed	Summary of Change
6.0	07/26/17	Placed document in latest GEM approved template; Changed title from "drug & alcohol testing" to "drug & alcohol work free environment"; Replaced "testing" with "screening", "that" with "to", "place" with "environment" in purpose' Change core process

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		<p>from “on boarding” to “HR administration”; Added “the intended audience for this procedure is DI and its majority owned subsidiary employees”, removed “this procedure applies to DI and its majority owned subsidiaries except in cases where host country laws dictate.” from the scope; Replaced “Testing” with “Screening” in 7.5 and 7.6; Added “or otherwise in accordance with management discretion” in 7.5.1; Added “S” to VP for 7.5.1.1, 7.6.1 and 7.6.3; Added 7.5.3 of “Rehires hired within 30 days from their last termination date do not need to complete a pre-employment drug & alcohol screening”; Replaced “testing” with “screening” in 7.6; Moved “Business Areas may, if required by an applicable customer contract or mandated by other special circumstances, implement standards related to the drug and alcohol free work place that exceed the requirements stated in this procedure. The implementation of these standards shall be reviewed in advance and approved by the Human Resources (HR) Vice President (VP) of the responsible business segment and the HR Senior Vice President (SVP)” to 7.7 and removed “an” and “business areas may”; added “management may”; replaced “place” with “environment” and removed HR VP business segment reference</p>
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