

DRUG FREE WORKPLACE

1. PURPOSES

The purposes of this policy are as follows:

- (a) To establish and maintain a safe, healthy working environment for all employees;
- (b) To reduce the incidents of injury to persons or property;
- (c) To reduce absenteeism, tardiness and indifferent job performance; and
- (d) To provide an opportunity for outpatient rehabilitation for any employee who seeks the Company's help in overcoming any addiction to, dependence upon or problem with alcohol or drugs.

This policy is established pursuant to the drug-free workplace program under Florida's Workers' Compensation Law, Section 440.102, Florida Statutes. Pursuant to this policy, the Company may require an employee to submit to a test for the presence of drugs or alcohol and, if a drug or alcohol is found to be present in the employee's system at a level prescribed by this policy, the employee may be terminated and may forfeit eligibility for medical and indemnity benefits. All employees are hereby notified that it is a condition of employment for an employee to refrain from reporting to work or working with the presence of drugs or alcohol in his or her body and, if an injured employee refuses to submit to a drug or alcohol test, the employee forfeits eligibility for medical and indemnity benefits. In addition, an employee can be terminated automatically for refusing to take a drug or alcohol test requested under this policy.

2. UNDERSTANDING THIS POLICY

Due to the requirements of the law, including Florida's Workers' Compensation statute, Chapters 440.101 and 440.102, some of the provisions of this policy are technical in nature. Please do not hesitate to ask your supervisor or the Company's human resource professionals should you have any questions regarding this policy.

3. GENERAL DEFINITIONS

- (a) **"Alcohol"** - means ethyl alcohol (ethanol). References to use of alcohol include use of a beverage, mixture or preparation containing ethyl alcohol.
- (b) **"Drug"** - means alcohol, including a distilled spirit, wine, a malt beverage, or an intoxicating liquor; an amphetamine; a cannabinoid; cocaine; phencyclidine (PCP); a hallucinogen; methaqualone; an opiate; a barbiturate; a benzodiazepine; a synthetic narcotic; a designer drug; or a metabolite of any of the substances listed in this paragraph.
- (c) **"Drug test or test"** - means any chemical, biological, or physical instrumental analysis administered, by a laboratory certified by the U.S. Dept. of Health and Human Services or licensed by the Agency for Health Care Administration, for the purpose of determining the presence or absence of a drug or its metabolites. The Company's testing laboratory is LabCorp, 1904 Alexander Drive, RTP, NC, 27709; phone 800-833-3984.

- (d) **“Prescription or nonprescription medication”** - means a drug or medication obtained pursuant to a prescription or a medication that is authorized pursuant to federal or state law for general distribution and use without a prescription in the treatment of human diseases, ailments or injuries.
- (e) **“Specimen”** - means a tissue, hair, or a product of the human body capable of revealing the presence of alcohol and/or drugs or their metabolites, as approved by the U.S. Dept. Food & Drug Administration or the Agency for Health Care Administration.
- (f) **“Drug Rehabilitation Program”** - means a service provider, that provides confidential, timely, and expert identification, assessment, and resolution of employee drug abuse.
- (g) **“Initial Drug Test”** - means a sensitive, rapid, and reliable procedure to identify negative and presumptive positive specimens, using an immunoassay procedure or an equivalent, or a more accurate scientifically accepted method approved by the U.S. Food & Drug Administration or the Agency for Health Care Administration as such more accurate technology becomes available in a cost-effective form.
- (h) **“Medical Review Officer or MRO”** - means a licensed physician, employed or contracted with an employer, who has knowledge of substance abuse disorders, laboratory testing procedures, and chain of custody collection procedures; who verifies positive, confirmed test results, and who has the necessary medical training to interpret and evaluate an employee’s positive test result in relation to the employee’s medical history or any other relevant biomedical information. The Company’s current MRO is Dr. Neil J. Dash, 546 Franklin Ave, Massapequa, NY 11758; phone 800-343-1222.
- (i) **“Confirmation/Confirmed Drug Test”** - means a second analytical procedure used to identify the presence of a specific drug or metabolite in a specimen, which test must be different in scientific principle from that of the initial test procedure and must be capable of providing requisite specificity, sensitivity, and quantitative accuracy.

4. PRESCRIPTION AND NONPRESCRIPTION MEDICATIONS; CONSUMPTION OF HEMP PRODUCTS

No prescription drug shall be brought upon Company premises by any person other than the person for whom the drug is prescribed by a licensed medical practitioner, and shall be used only in the manner, combination and quantity as prescribed. Employees must keep all prescribed medicine in its original container, which identifies the drug, date of prescription, and the prescribing doctor. Employees must also report to the Benefits Manager the use of any prescribed drug which may alter the employee’s behavior or physical or mental ability prior to commencing work; however, employees should disclose only the actual or possible side-effects of the medication and should not identify the medication(s) being used or the reason for its use. The Company may change the employee’s job assignment during any period of time where a medical determination has been made that the employee’s use of a prescribed medication poses a direct threat to his/her safety or the safety of another employee.

Employees have the right to consult with a medical professional on technical information regarding prescription or nonprescription medication for the purpose of interpreting the test result to determine whether the result could have been caused by prescription or nonprescription medication taken by the employee or job applicant. Employees currently taking prescription medication pursuant to a doctor's directive are to complete the "Acknowledgment of Receipt of Medications List and Voluntary Disclosure of Use of Medicine" form, taking care to list all medications for which they have a prescription. Employees who choose to complete this form must provide it to the Company's Medical Review Officer prior to testing. . Any drug not acknowledged which is detected in a positive test result will be presumed to have been taken without a doctor's directive and subject the employee or job applicant to discharge or loss of employment opportunity.

The consumption of food and food-products containing hemp may cause an employee to test positive. A test result that is positive as a result of an employee's consumption of food or food-products containing or made from hemp or hemp products will be reported as a positive test and subject the employee to discipline, up to and including termination.

5. PROHIBITIONS

THE FOLLOWING CONDUCT IS ABSOLUTELY PROHIBITED AND IS CAUSE FOR TERMINATION:

1. Use, possession, manufacture, distribution, dispensation or sale of illegal drugs or drug paraphernalia on Company premises or Company business, in Company supplied vehicles, or during working hours;
2. Unauthorized use or possession, or any manufacture, distribution, dispensation or sale of a controlled substance on Company premises or Company business, in Company supplied vehicles, or during working hours;
3. Unauthorized use, manufacture, distribution, dispensation of, possession or any sale of alcohol on Company premises or Company business, in Company supplied vehicles, or during working hours;
4. Storing in a locker, desk, automobile or other repository on Company premises any illegal drug, drug paraphernalia, any controlled substance whose use is unauthorized, or any alcohol;
5. Consuming or being under the influence of an unauthorized controlled substance or illegal drug on Company premises or Company business, in Company supplied vehicles, or at any time during an employee's workday; "being under the influence" of an unauthorized controlled substance or illegal drug is defined as testing positive at a specified ng/ml level.
6. Consuming alcohol at any time during an employee's workday. This includes, but is not limited to, while an employee is on or off the premises of the Company, as well as during the employee's meal and other break periods. Exception: This prohibition does not include the authorized and reasonable consumption of alcohol by an employee of legal drinking age at functions or activities sponsored by the Company or a client. However, an employee who is requested to submit to a "reasonable

suspicion” alcohol test as a result of such drinking and whose breath alcohol test result is 0.05 or greater will be considered to have consumed more than a reasonable amount and will be in violation of this policy;

7. Use of alcohol off Company premises that adversely affects the employee’s work performance, his own or others’ safety at work or the Company’s regard or reputation in the community;
7. Possession, use, manufacture, distribution, dispensation or sale of illegal drugs off Company premises that adversely affects the employee’s work performance, his own or others’ safety at work or the Company’s regard or reputation in the community;
8. Switching, substituting, or adulterating any urine sample submitted for testing;
9. Refusing consent to testing or to submit a breath, saliva, urine, or blood sample for testing when requested by management;
10. Refusing or failing to immediately report to the testing laboratory and submit a specimen for testing when requested by management;
11. Refusing to submit to an inspection when requested by management;
12. Failing to adhere to the requirements of any drug or alcohol treatment or counseling program in which the employee enrolled;
13. Conviction under any criminal drug or alcohol statute;
14. Arrest under any criminal drug or alcohol statute under circumstances which adversely affect the Company’s regard or reputation in the community;
15. Failure to notify the Company of any arrest or conviction under any criminal drug or alcohol statute within five days of the arrest or conviction;
16. Failure to keep prescribed medicine in its original container;
17. Refusing to sign a statement agreeing to abide by the Company’s Drug Free Workplace policy;
18. Refusal to complete a Consent Form prior to testing;
19. Refusal to complete the Chain of Custody Form after submission of a urine or blood specimen.

6. CONDITIONS UNDER WHICH DRUG AND ALCOHOL TESTS WILL BE CONDUCTED

- A. “Pre-employment”** - means that all applicants for employment will be required to take a pre-employment drug and alcohol urinalysis test. Applicants whose test results are positive for alcohol or drugs will not be hired.
- B. “Reasonable suspicion drug testing”** - means drug and alcohol testing based on

a belief that an employee is using or has used drugs or alcohol in violation of the Company's policy. The suspicion may be drawn from specific objective and articulable facts and reasonable inferences drawn from those facts in light of experience. Among other things, such facts and inferences may be based upon:

1. Observable phenomena while at work, such as direct observation of drug use or of the physical symptoms or manifestations of being under the influence of a drug or alcohol.
2. Abnormal conduct or erratic behavior while at work or a significant deterioration in work performance.
3. A report of drug or alcohol use, provided by a reliable and credible source.
4. Evidence that an individual has tampered with a drug test during his employment with the Company.
5. Information that an employee has caused, contributed to, or been involved in an accident while at work.
6. Evidence that an employee has used, possessed, sold, solicited, or transferred drugs or alcohol while working or while on Company premises or while operating Company vehicles, machinery or equipment.

C. "Routine Fitness for Duty" - means that the Company will require an employee to submit to a drug and alcohol test if the test is conducted as part of a routinely scheduled employee fitness-for-duty medical examination that is part of the Company's established policy or that is scheduled routinely for all members of an employment classification or group.

D. "Follow-up" - means that if the employee in the course of employment enters an alcohol and drug rehabilitation program, the Company will require the employee to submit to a drug and alcohol test as a follow-up to such program unless the employee voluntarily enters the program. In that case, the Company has the option not to require follow-up testing. If follow-up testing is required, it will be conducted at least once a year for a 2-year period after completing the program. Advance notice of a follow-up testing date will not be given to the employee to be tested.

E. "Random Testing" – means that the Company may conduct random drug tests and random alcohol tests on employees.

1. Random tests will be unannounced ahead of time and the dates of such tests will be spread out reasonably throughout the calendar year.
2. Employees who will be subject to random testing will be put into one or more random selection pools and will be selected for testing by the Company using a scientifically-valid random selection process that ensures that each employee in the selection pool has an equal chance of being selected each time a selection is conducted. Appropriate safeguards will be used to ensure that the identity of individual employees who could be selected cannot be determined until after an employee is actually selected.

3. Whenever an employee is notified of his or her selection, the employee must proceed to the test site immediately and no employee will be excused.

7. TESTING PROCEDURES

A. Drugs for Which a Test Will Be Conducted

ALCOHOL (booze, hootch, drink, beer, liquor, wine, moon shine). All liquid medications containing ethyl alcohol (ethanol). Please read the label for alcohol content. As an example, Vick's Nyquil is 25% (50 proof) ethyl alcohol. Comtrex is 20% (40 proof). Contact Severe Cold Formula Night Strength is 25% (50 proof) and Listerine is 26.9% (54 proof).

AMPHETAMINES --(bennies, black beauties, crystal, speed uppers, crank) Obetrol, Biphphetamine, Desoxyn, Dexedrine Didrex.

CANNABINOIDS --(marijuana, hashish, maryjane, grass, reefer pot, dope, etc.) Marinol (Dronabinol, TEC).

COCAINE -- (coke, crack, blow, nose candy, toot, snow) Cocaine HCl topical solution (Roxanne).

PHENCYCLIDINE --(PCP, angel dust).

METHAQUALONE --(ludes, qualude, optimil, parest, somnafac, sopor)

OPIATES --(heroin, horse, smack, powder) Paregoric, Parepectolin, Donnagel PG, Morphine, Tylenol with Codeine, Empirin with Codeine, APAP with Codeine, Aspirin with Codeine, Robitussin AC, Guiatuss AC, Novahistine DH, Novahistine Expectorant, Dilaudid (Hydromorphone), M-S Contin and Roxanol (morphine sulfate) Percodan, Vicodin, etc.

BARBITURATES --(barbs, rainbows, downers, goofballs, reds, yellows, blues) Phenobarbital, Tuinal, Amytal, Nembutal, Seconal, Lotusate, Fiorinal, Fioricet, Esgic, Butisol, Mebaral, Butabarbital, Butabital, Phrenilin, Triad, etc.

BENZODIAZEPINES -- Ativan, Azene, Clonopin, Dalmane, Diazepam, Librium, Xanax, Serax, Tranxene, Valium, Verstran, Hacion, Paxipam, Restoril, Centrax.

METHADONE -- Dolophine, Methadose

PROPOXYPHENE -- Darvocet, Darvon N., Dolene, etc.

B. Individuals to be Tested -- All applicants and employees are subject to testing under this policy.

C. Voluntary notification of drug use and/or abuse -- An employee who has not previously tested positive for drug or alcohol use, or entered a drug or alcohol rehabilitation program, and who comes forward voluntarily seeking treatment shall

not be subject to discipline solely for coming forward. All such employees are urged to seek help immediately. Once a test has been scheduled, all employees are required to cooperate with the designated Benefits Manager to provide information regarding prescriptive and over-the-counter medications which could cause a positive result.

D. Refusal to Test -- If an employee refuses to submit to a test for drugs or alcohol, he/she may forfeit his/her eligibility for all workers compensation medical and indemnity benefits and will be terminated from employment. An employee who engages in any of the following conduct will be considered to have refused to submit to a test:

1. Refusing or failing to appear for any substance abuse test within a specified time, as determined by the Company, after being directed to do so by the Company;
2. Failing to sign an authorization form permitting the release of the drug test result to the Company;
3. Failing to remain at the testing site until the testing process is complete;
4. Failing to provide a urine specimen, or breath or saliva specimen for testing;
5. Failing to attempt to provide a urine, breath or saliva specimen for testing;
6. Failing to provide a sufficient amount of urine or breath when directed, without an adequate medical explanation;
7. Failing or declining to take a second drug or alcohol test that the Company or collector has directed to be taken;
8. Failing to undergo a medical examination or evaluation, as directed by the MRO as part of the verification process, or as directed by the Company as part of the "shy bladder" procedures, or the insufficient breath procedures (which are discussed in the Summary of Procedures for Testing Employees and Applicants);
9. Adulterating or substituting a urine specimen, or attempting to adulterate or substitute a urine specimen;
10. In the case of a directly observed or monitored collection in a drug test, failing to permit the observation or monitoring of the provision of a urine specimen;
11. Refusing or failing to notify the Company promptly that the employee was involved in a work-related accident (as defined in Section 3.2 of this policy), without a valid excuse; or,
12. Failing to cooperate with any part of the testing process such as by delaying the collection, testing or verification process or otherwise engaging in conduct that clearly obstructs or manipulates, or attempts to obstruct or

manipulate, the testing process.

- E. Initial Test** -- The initial screen for all drugs shall use an immunoassay procedure or equivalent, or a more accurate scientifically accepted method approved by the U.S. FDA or the Agency for Health Care Administration. The initial test for alcohol shall be an enzyme oxidation methodology. The following cutoff levels shall be used when first screening specimens to determine whether they are positive or negative for these drugs or metabolites. All levels equal to or exceeding the following shall be reported as positive.

Alcohol	.05 g/dl%
Amphetamines	1,000 ng/ml
Cannabinoids	100 ng/ml
Cocaine	300 ng/ml
Phencyclidine	25 ng/ml
Methaqualone	300 ng/ml
Opiates	300 ng/ml
Barbiturates	300 ng/ml
Benzodiazepines	300 ng/ml
Synthetic Narcotics:	
Methadone	300 ng/ml
Propoxyphene	300 ng/ml

No employee shall be terminated solely on the basis of a positive initial test.

- F. Confirmation Test** -- All specimens identified as positive on the initial tests shall be confirmed using a second test, a gas chromatography/mass spectrometry (GC/MS) test or an equivalent or more accurate scientifically accepted method approved by the Agency for Health Care Administration or the U.S. FDA as such technology becomes available in a cost-effective form. The following confirmation cutoff levels shall be used when analyzing specimens to determine whether they are positive or negative for these drugs or metabolites. All levels equal to or exceeding in the following shall be reported as positive:

Alcohol	.05 g/dl%
Amphetamines	500 ng/ml
Cannabinoids	15 ng/ml
Cocaine	150 ng/ml
Phencyclidine	25 ng/ml
Methaqualone	150 ng/ml
Opiates	300 ng/ml
Barbiturates	150 ng/ml
Benzodiazepines	150 ng/ml
Synthetic Narcotics:	
Methadone	150 ng/ml
Propoxyphene	150 ng/ml

If these tests confirm the presence of drugs or alcohol in the specimen of an employee, that individual will be terminated.

G. Collection Site Procedures - Chain of Custody

1. As part of the Company's Drug-Free Workplace Policy, the Company will only utilize a laboratory licensed or certified by the Agency for Health Care Administration. The Company's testing laboratory is LabCorp, 1904 Alexander Drive, RTP, NC, 27709; phone 800-833-3984.
2. The laboratory will be required to follow Florida law and the rules established by the Agency for Health Care Administration.

8. REPORTING OF RESULTS

A. Medical Review Officer (MRO)

1. The laboratory shall report test results to the MRO within seven working days after receipt of the specimen by the laboratory.
2. The laboratory shall report as negative to the MRO all specimens which are negative on the initial test or negative on the confirmation test. Only specimens which are confirmed as positive on the confirmation test shall be reported positive to an MRO for a specific drug.
3. The laboratory shall transmit results to the MRO in a manner designed to ensure confidentiality of the information. The laboratory and MRO must ensure the security of the data transmission and restrict access to any data transmission, storage and retrieval system.
4. The MRO may request from the laboratory, and the laboratory shall provide, quantification of test results. The MRO shall evaluate the drug test result(s), which is reported out by the laboratory, to verify by checking the chain of custody form that the specimen was collected, transported, and analyzed under proper procedures, and to determine if any alternative medical explanation caused a positive test result. The MRO shall review all medical records made available by the tested individual.
5. Upon verifying a negative test result, the MRO is required to retain the chain of custody forms confidentially for five years.
6. Within three days of the receipt of a positive test result from the laboratory, the MRO is required to notify the employee or applicant and to inquire as to whether prescriptive or over-the-counter medication could have caused the positive result. The individual has five days after notification to submit documentation of any prescriptions relevant to the positive test result and discuss the test result with the MRO.

- (a) If the MRO is unable to contact a positively tested donor within three days of the receipt of the test results from the laboratory, the MRO must contact the employer and request the employer to direct the donor to contact the MRO as soon as possible. If the donor does not contact the MRO within two days following the request, the MRO will verify the test result as positive.
 - (b) The MRO may change the verification upon a showing of good cause by the donor as to why contact could not be made within two days only if the donor also presents information concerning a legitimate explanation for the positive test results.
- 7. Upon verifying a positive test result, the MRO must notify the employer in writing and retain the chain of custody forms confidentially for five years.
- 8. If the MRO determines that there is a legitimate medical explanation for the positive test result, the MRO must report a negative test result to the employer. However, in circumstances where the MRO believes that the legal use of a drug(s) would endanger the individual or others, or if the individual is in a safety sensitive or special risk position, the MRO must report the result as negative due to a validated prescription and must request that the individual be placed in a position which would not threaten the safety of the individual or others.
- 9. The MRO may order a re-analysis of the original sample at any licensed laboratory licensed under Chapter 10E-18, Florida Administrative Code.
- 10. Unless otherwise instructed by the employer in writing, all records pertaining to a given specimen shall be retained by the drug testing laboratory for a minimum of two years.
- 11. The MRO for our Company is the Medical Review Officer of the Doctors Review Service- (Laboratory).

B. Employee Challenges

- (1) Within five (5) working days after receipt of a positive confirmed test result from the medical review officer, the Company shall inform an employee or job applicant in writing of such positive test result, the consequences of such results, and the options available to the employee or job applicant.
- (2) The Company shall provide to the employee or job applicant, upon request, a copy of the test results.

- (3) Within five (5) working days after receiving notice of a positive confirmed test result, the employee or job applicant may submit information to the medical review officer explaining or contesting the test results, and why the results do not constitute a violation of Company policy.
- (4) If an employee's or job applicant's explanation or challenge of the positive test results is unsatisfactory to the medical review officer, the medical review officer shall report a positive test result back to the employer. The employee or job applicant may submit information to the employer explaining or contesting the test results and why the results do not constitute a violation of Company policy. If the employee's or job applicant's explanation or challenge of the positive test result is unsatisfactory to the employer, a written explanation as to why the employee's or job applicant's explanation is unsatisfactory, along with the report of positive results, shall be provided by the Company to the employee or job applicant within 15 days of the receipt of the explanation or challenge. All such documentation shall be kept confidential by the Company and shall be retained by the Company for at least one (1) year. A person may contest the drug test result pursuant to rules adopted by the Dept. of Labor and Employment Security.
- (5) In the event of a workplace injury and the Company's decision to deny workers' compensation benefits due to a positive drug test, an employee or job applicant may undertake an administrative challenge by filing a claim for benefits with a Judge of Compensation Claims. If no workplace injury has occurred, the person must challenge the test result in a court of competent jurisdiction. When an employee undertakes a challenge to the results of a test, it shall be the employee's responsibility to notify the laboratory and the sample shall be retained by the laboratory until the case is settled.
- (6) Within seven (7) days after testing based on reasonable suspicion, the Company shall detail in writing the circumstances which formed the basis of the determination that reasonable suspicion existed to warrant the testing. A copy of this documentation shall be given to the employee upon request and the original documentation shall be kept confidentially by the Company and retained for at least one (1) year.
- (7) During the 180 day period after written notification of a positive test result, the employee who has provided the specimen shall be permitted by the Company to have a portion of the specimen retested, at the employee's expense. Such retesting shall be done at another laboratory, licensed or approved by the Agency for Health Care Administration, chosen by the employee or job applicant. The second laboratory must test at equal or greater sensitivity for the drug in question as the first laboratory. The first laboratory that performed the test for the Company is responsible for the transfer of the portion of the specimen to be retested, and for the integrity of the chain of custody during such transfer.
- (8) Employees and applicants have the right to consult the Medical Review Officer regarding prescription or non-prescription medication.

- (9) The Company shall pay the cost of all drug tests, initial and confirmation, which it requires of employees. An employee or job applicant shall pay the costs of any additional drug tests not required by the Company.
- (10) All employees and job applicants are responsible for notifying the laboratory of any administrative or civil action brought pursuant to the Drug-free Workplace regulations.

9. CONFIDENTIALITY

The results of drug tests and all related information, reports, statements and memoranda will be treated as confidential, and distribution shall be limited to those having a "need to know." Results may be revealed to the proper authorities if the situation requires. Otherwise, such information shall be released only pursuant to a written consent form signed voluntarily by the employee.

10. EFFECTIVE DATE -- NOTICE TO EMPLOYEES

- (a) The policies set forth in this policy are effective immediately upon notice to employees. Employees will be subject to drug and alcohol testing pursuant to this policy beginning sixty (60) days after the effective date of this policy. During the (60) day period after the effective date of this policy, Employees will remain subject to drug and alcohol testing pursuant to of the he Company's prior Drug Free Workplace Policy. Employment applicants will be subject to drug testing pursuant to this policy immediately.
- (b) Cut-off levels used by the testing laboratory when analyzing specimens to determine whether they are positive or negative for drugs and metabolites may change from time to time. The Company will follow recommendations established for the testing laboratory and will modify the Company's policy to comply with any new standards.
- (c) The Company shall include notice of drug testing on vacancy announcements for those positions for which drug testing is required. A notice of the drug testing policy will also be posted in an appropriate and conspicuous location on the Company's premises, and copies of the policy will be made available for inspection during regular business hours in the personnel office or other suitable locations.

11. EDUCATION

- (a) The Company maintains a current resource file of providers of employee assistance including alcohol and drug abuse programs, mental health providers, and various other persons, entities or organizations designed to assist employees with personal or behavioral problems.

- (b) The Company also provides an annual education course for employees to assist in identifying personal and emotional problems which may result in the misuse of alcohol and/or drugs.

12. RESERVATION OF RIGHTS

- (a) The Company retains the sole right to interpret, change or discontinue this policy as may be necessary from time-to-time.
- (b) Nothing in this policy should be construed as creating a contract of employment. Your at will employment relationship cannot be changed except in writing by the President of the Company.