

JPMC DRUG TESTING POLICY

Supplier shall be responsible for determining, by random selection or other lawful and appropriate means, which Designated Supplier Personnel are required to take a drug screening test prior to the first day of their assignment at JPMorgan Chase & Co. (including its subsidiaries and affiliates "JPMC"). Supplier must ensure and warrant that, at all times, a minimum of five (5) percent of all Designated Supplier Personnel who are onboarded at JPMC have passed a drug test within ninety days prior to their start date. "Designated Supplier Personnel" are Supplier personnel as defined in the agreement for services between JPMC and Supplier. In the event that Designated Supplier Personnel are not defined in an agreement, Designated Supplier Personnel means any Supplier personnel that (i) work at a site of any JPMC and receive a JPMC identification access badge, or (ii) have the ability to write, alter, modify, remove or delete (A) JPMC confidential information; (B) the networks or systems of any JPMC; or (C) property of JPMC or its customers (tangible or intangible).

Drug testing will be conducted by Supplier at Supplier's expense. JPMC, at its discretion, has the right to audit Supplier's drug test records and procedures pertaining to Designated Supplier Personnel.

It is Supplier's responsibility to warrant that it will use a drug test laboratory that is Substance Abuse Mental Health Service Administration (SAMHSA) certified and will conform to the minimum JPMorgan Chase & Co. Health Services Drug Testing Standards, a current copy of which is attached hereto as Appendix 1.

During Designated Supplier Personnel's assignment with JPMC, the Supplier Personnel must be able to carry out their jobs in a working environment that is free from alcohol and drug misuse. Designated Supplier Personnel must not, at any time, conduct business while under the influence of prohibited drugs or alcohol. During Designated Supplier Personnel's assignment with JPMorgan Chase & Co., if there is reason to believe that their work is being impaired as a result of alcohol and/or drug misuse, Supplier may be required to have such Designated Supplier Personnel undergo a drug screening test in order to remain on such assignment. Under certain circumstances, Designated Supplier Personnel may also be asked to take a random test for drugs or alcohol if they perform a job that could affect the safety of themselves or others. If Designated Supplier Personnel refuse to cooperate in a drug screening test, they may be subject to immediate removal from their assignment.

Supplier must notify Designated Supplier Personnel that in the event they are convicted of any drug-related crime involving the sale, manufacture, distribution of or trafficking in controlled substances, they must immediately notify Supplier, who in turn must immediately notify JPMC, and such member of Designated Supplier Personnel will no longer be eligible for such assignment. If such Designated Supplier Personnel fails to so notify Supplier, corrective action may include immediate removal from their assignment.

Compliance with the procedures set forth above will not relieve Supplier of its obligation to review its personnel or subcontractor's personnel applications and the JPMC Pre-Assignment Statements, or of its obligation regarding the selection, placement and supervision of

Designated Supplier Personnel.

APPENDIX 1 TO JPMC DRUG TESTING POLICY

JPMORGAN CHASE & CO. HEALTH SERVICES DRUG TESTING STANDARDS

Testing must be performed at a Substance Abuse Mental Health Service Administration (SAMHSA) certified laboratory.

The urine specimen must be collected via the Chain of Custody (COC) Protocol. The urine specimen must be tested for the following:

Substances:

1. Amphetamines
2. Cocaine
3. Opiates
4. Phencyclidine (PCP)

Agents:

1. Creatinine
2. Nitrite
3. PH

If the preliminary screening is a positive result, a confirmation test - Gas Chromatography/Mass Spectroscopy (GC/MS) - must be performed.

All positive results must be reviewed by a Medical Review Officer (MRO).

If you have any questions, regarding this standard, please contact Rebecca Mazzella as the contact for drug testing questions. Please use phone number 212-270-5558.