

Substance Abuse Policy

OPT has the responsibility to maintain a safe and productive work environment free from the adverse effect of alcohol, controlled substances and drugs. Employees who work while under the influence of alcohol, controlled substances or drugs present a risk to co-workers, company assets, the community and themselves. Therefore it is OPT policy that any person impaired by the use of alcohol, controlled substances or drugs is prohibited from entering OPT facilities, engaging in OPT business or operating OPT equipment. Also, trading and illegal or unauthorized use or possession of alcohol, controlled substances and drugs is strictly prohibited while on OPT premises or engaged in OPT business.

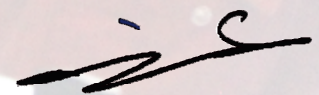
This policy does not apply to:

- The use of prescribed drugs provided there do not affect the person's ability to perform his/her duties in a safe and productive manner.
- The moderate and responsible consumption of alcohol on non-operational premises or at company business or social functions or in connection with business travel or entertainment if local law permits, and if allowed by, and under the control of, local management.

Inspection and Tests: OPT reserves the right to conduct at the work site or at the point of departure to, or return from, the work site, in an appropriate manner and without prior announcement, inspection of the work effects, lockers, vehicles and quarters of any person subject to this policy and/or tests of employees, agents and subcontractors. In particular such inspection or tests shall be conducted under, but not limited to, the following circumstances: Pre-employment or re-employment, after an accident, reasonable suspicion, compliance with law or regulation, under a client program, after a rehabilitation program.

Disciplinary Action: Anybody who refuses to submit to a search or test or is found in violation of the above policy shall be subject to applicable lawful disciplinary action and/or removal from OPT property.

Laws and regulations: This policy must be administered and enforced in accordance with applicable laws. In the event of a conflict between any provisions of this policy and applicable laws, the applicable laws shall apply.



John Zhijun Xiao
Chairman