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DRUG AND ALCOHOL REQUIREMENTS

SAFETY MANAGEMENT SYSTEM

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Notes:

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Revision Summary		
Revision No.	Date	Description
0	July 1, 2015	New procedure which is an amalgamation Acuren and RAT procedures.
1	April 1, 2016	Scaffolders added to as a Safety Sensitive Position
2	Sept 5, 2017	Change to type of testing done for post-incident, suspicion; multiple typographical updates and revisions
3	Oct 5, 2018	Amendments to address legalization of cannabis
4	Sept 17, 2020	Editorial update; Definition of Oral Swab and associated testing protocol. Additional Amendments to address random results reliability
5	Feb. 24, 2021	Update section 6.2.3 for random testing process



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1.0 PURPOSE

- 1.1 To communicate standards supportive of a safe work environment including the risks associated with the inappropriate use of alcohol and drugs in the workplace.
- 1.2 To endorse and comply with the “Canadian Model for Providing a Safe Workplace – Alcohol and Drug Guidelines and Work Rule” developed by the Construction Owners Association of Alberta and Energy Safety Canada.
- 1.3 To increase employee awareness about the potential risks associated with the consumption or use of alcohol or drugs and the impact on safety, health, environmental and operational incidents in the workplace.
- 1.4 To identify standards and processes utilised to ensure a safe work environment free from the risk of impairment caused by alcohol and drugs.

2.0 SCOPE

- 2.1 This Procedure applies to all employees of Acuren Inc., Acuren Group Inc., Tacten Industrial Inc., Skystone International, and their affiliates collectively, known as “ACUREN”.
- 2.2 Where Owners have an applicable policy regarding Alcohol and Drug requirements, the Company will adhere to the more stringent requirement.

3.0 DEFINITIONS

In this alcohol and drug policy, the following definitions apply:

Alcohol: Any substance that may be consumed and that has an alcoholic content in excess of 0.5 per cent by volume.

Designated Representative: An individual that manages the post-test process on behalf of the Company.

Drug paraphernalia: Any equipment, product, or material that is modified for making, using or concealing drugs.

Drugs: Includes any substance, chemical the use or possession of which is unlawful in Canada or requires a personal prescription or authorization from a licensed treating physician, or the use of which is regulated by legislation such as marijuana/cannabis, or any other psychoactive substance, and any non-prescription medication lawfully sold in Canada, and drug paraphernalia.

Employee: All individuals including sub-contractors engaged in work at a workplace on behalf of the Company.

Employee & Family Assistance Program (EAP): An external vendor contracted by the Company to help employees who are experiencing personal and/or professional issues requiring support.



Fit-for-duty: Is the physical, mental, and emotional state of an employee that enables the employee to perform the essential tasks of his or her work assignment in a manner which does NOT threaten the safety or health of oneself, co-workers, or property.

Impairment: Refers to impaired memory, mood, ability to concentrate, ability to divide attention between two tasks, ability to engage in complex reasoning, ability to judge distance, speed and time or manipulate objects in a three-dimensional environment, or the more commonly understood effects on gross and fine motor coordination and control.

Incident: An occurrence, circumstance, condition or near-miss that caused or had the potential to cause damage to person, property, reputation, security or the environment.

Laboratory: A laboratory providing urine-based drug testing services or oral fluid-based testing services on behalf of the Company certified by the United States Department of Health and Human Services under the National Laboratory Certification Program.

Manager: An individual designated by the Company as having authority over a workplace.

Medical Marijuana: Refers to marijuana used in accordance with the Access to Cannabis for Medical Purposes Regulations (ACMPR), and prescribed by a registered medical professional.

Medical Review Officer (MRO): A licensed physician, currently certified with the American Association of Medical Review Officers or Medical Review Officer Certification Council, with knowledge of substance abuse disorders and the ability to evaluate an employee's test results, who is responsible for receiving and reviewing laboratory results generated by an employer's drug testing program and evaluating medical explanations for certain drug test results.

Negative test result: A report from the Medical Review Officer that the employee who provided the specimen for alcohol and drug testing (laboratory-based) was not in violation of the prescribed limits as set forth by this policy.

Oral Fluid Testing (Oral Swab)- Oral fluid testing is a method used to collect a saliva sample from a test subject and analyze it for the presence of hormones, drugs, antibodies or other molecules. In the workplace setting, oral fluid testing is most often used to detect the presences of drugs or alcohol. Using an absorbent device to swab the test subject's mouth, saliva is collected and then analyzed at the point of collection or sent to a lab for more detailed analysis

Owner: The client or general contractor that has prime authority over a worksite.

Non-negative test result: A report from the Medical Review Officer that the employee who provided the specimen for alcohol and drug testing (laboratory-based) did have an alcohol or drug concentration level equal to or in excess of the prescribed limits as set forth by this policy.

Prescription Drugs: Drugs that can only be obtained with a prescription from a registered health care professional licensed to prescribe drugs. Prescription drugs must be prescribed



to a specific individual, have a drug identification number and be dispensed by a licensed pharmacist.

Reasonable grounds: Includes information established by the direct observation of an employee's conduct or other indicators, such as the physical appearance and behaviour of employees, the smell associated with the use of alcohol or drugs on his or her person or in the vicinity of his or her person, his or her attendance record or unexplained absences during regular working hours, circumstances surrounding an incident or near miss and the presence of alcohol, drugs or drug paraphernalia in the vicinity of the employee or the area where the employee worked.

Random Selection: A third party computer-generated selection process which chooses employees randomly and entirely by chance, such that each individual has the same probability of being chosen at any stage during the selection process.

Rehabilitation program: A program tailored to the needs of an individual which may include education, counselling and residential care offered to assist a person to comply with the alcohol and drug work rule.

Safety Sensitive Occupation (SSP): An occupation within the company in which incapacity due to drug or alcohol impairment could result in direct and significant risk of injury to the employee, others or the environment.

Substance Abuse Professional (SAP): A licensed physician; a licensed or certified social worker; a licensed or certified psychologist; a licensed or certified employee assistance expert; or an alcohol and drug abuse counsellor. He or she has received training specific to the SAE roles and responsibilities, has knowledge of and clinical experience in the diagnosis and treatment of substance abuse-related disorders, and has an understanding of the safety implications of substance use and abuse.

Supervisor: A person who directs the work of others and may, depending on the nature of the company's structure, include the foreman, general foreman, supervisor, superintendent and team leader.

Tamper: To alter, meddle, interfere with or change.

Work: Includes the application of labour and/or trades and professional skills, as well as breaks, meetings and training while at a work site or company workplace.

Workplace: Includes all real or personal property, facilities, land, pipeline right-of-way, buildings, equipment, containers, vehicles, vessels, boats and aircraft whether owned, leased or used by Acuren or client and wherever it may be located.



4.0 ROLES AND RESPONSIBILITIES

4.1 Employee responsibilities:

- 4.1.1 To understand their obligations within the Company's alcohol and drug policy and procedure to ensure they perform work activities in a safe manner.
- 4.1.2 To report for scheduled work fit for duty and remain fit for duty when on the job and during paid standby.
- 4.1.3 When prescribed a medication:
 - a) Use it in the manner directed by the prescribing licensed medical practitioner, or as stipulated by the manufacturer of the drug.
 - b) Disclose to the immediate supervisor or Human Resources representative the use of prescription drugs where they may cause impairment and compromise fitness for duty. Such disclosure may result in additional assessment to determine fitness for work dependent upon nature and duration of prescription, and/or the requirement to participate in a modified work program, depending upon associated restrictions.
 - c) Employees who fail to disclose the use of a medication that may cause impairment will result in discipline up to and including termination of employment.
- 4.1.4 To encourage peers or co-workers to seek help when there is a potential breach of policy.
- 4.1.5 To proactively disclose to the Company any drug or alcohol-related addiction so that assistance may be obtained.

4.2 Supervisor or Manager responsibilities:

- 4.2.1 To attend and participate in alcohol and drug awareness training. This training will include techniques for recognizing the symptoms of the use of alcohol and drugs.
- 4.2.2 To investigate all reported or suspected alcohol or drug use by employees.
- 4.2.3 To disclose to an employee the reason for requesting an alcohol and drug test.
- 4.2.4 To escort a worker to and from the alcohol and drug test site when required to perform a test

4.3 Human Resources Director responsibilities:

- 4.3.1 To coordinate the Company Drug and Alcohol Program, ensuring the use of a vendor employing collection personnel trained to United States Department of Transportation (DOT) Workplace Drug and Alcohol Testing standards.
- 4.3.2 To oversee the confidential receipt, distribution and storage of testing results for employees of the Company and to ensure tests, where non-negative, are addressed in an appropriate manner.
- 4.3.3 Oversee all educational and training programs, regarding the topic.



- a) The Company's orientation training shall include a description of the Drug and Alcohol procedure.
- 4.3.4 Assign Designated Regional Representatives for all Regions.
- 4.3.5 Manage and facilitate the substance abuse professional program.
- 4.3.6 Facilitate supervisory training and awareness in dealing with the use of alcohol and drugs in the workplace.
- 4.3.7 Ensure that the alcohol and drug testing is performed according to the standards set out in this document.
- 4.4 Designated Regional Representative:
 - 4.4.1 Ensure employees are aware of the Employee & Family Assistance Program (EFAP).
 - 4.4.2 Assist in obtaining confidential assessment, counselling, referral and rehabilitation services.
 - 4.4.3 Actively support and encourage rehabilitation activities and re-employment opportunities where applicable.
 - 4.4.4 Ensure that the alcohol and drug testing is performed according to the standards set out in this document.
- 4.5 Regional Leadership:
 - 4.5.1 Ensure the allocation of sufficient resources to assist workers in obtaining confidential assessment, counselling, referral and rehabilitation services.
 - 4.5.2 Ensure regional managers are complying with the terms of this document.

5.0 ALCOHOL AND DRUG REQUIREMENTS

- 5.1 All employees are expected to be fit for work while performing any duties related to their employment. As such, all employees must be free from the influence of, and are prohibited from the use of, offer of sale, or possession of the following items:
 - 5.1.1 Illicit drugs including:
 - a) Cocaine metabolites
 - b) Opiate metabolites
 - c) Phencyclidine
 - d) Amphetamines
 - e) Methamphetamines
 - f) Benzodiazepines
 - g) Barbiturates
 - h) Methadone
 - i) Oxycodone



- j) Ecstasy
 - k) Propoxyphene
- 5.1.2 Non-prescribed drugs for which a prescription is legally required.
- 5.1.3 Legal impairing substances such as alcohol or cannabis
- 5.1.4 Drug paraphernalia
- 5.2 Employees are expected to arrive to work free from impairment.
 - 5.2.1 No employee shall report to work with a blood alcohol concentration of .04% or higher in one hundred millilitres of blood, breath, or saliva (See table below).
 - 5.2.2 No employee shall report to work with drug levels equal to or in excess of the concentration limits set out below.
- 5.3 Employees who work in **safety sensitive positions** who are required to use prescription or over the counter drugs, are obligated to immediately notify the supervisor or Regional Designate where such medications have the potential to impact on physical or cognitive capability.
- 5.4 All use of prescription or over-the counter medications while at work must comply with the direction of a licensed medical practitioner, pharmacist, or as stipulated by the manufacturer of the drug.
- 5.5 Employees who work in safety sensitive positions may work while using a prescription drug, including medically authorized cannabis prescribed in accordance with the Access to Cannabis for Medical Purposes Regulations (ACMPR), following a determination that the use of the prescription drug does not cause impairment or adversely affect the employee's ability to safely perform his or her duties.
 - 5.5.1 In the case of medical cannabis, such determination requires specific information regarding the frequency, volume and method of ingestion, and confirmation from a licensed medical practitioner that such dose shall not cause impairment during working hours.
 - 5.5.2 Where the licensed medical practitioner is unable to verify the ability to work without impairment, the Company will attempt to accommodate the employee in suitable alternate work where it exists, or approve the employee for an unpaid leave of absence for the duration of the prescription use.
- 5.6 The supervisor or manager who has received a notification may not disclose any information provided under this procedure to any person other than a person who needs to know, to discharge a statutory or common-law obligation.
- 5.7 No employee may refuse to:
 - 5.7.1 Comply with a request made by a Supervisor or Designated Regional Representative as a result of suspected possession of alcohol or drugs ([section 10.0](#)),
 - 5.7.2 Comply with a request to submit to an alcohol and drug test made under to observed employee conduct ([section 11.0](#)), or post-incident ([section 12.0](#)).



6.0 REQUIREMENTS FOR ALCOHOL AND DRUG TESTING PROGRAMS

- 6.1 The Company will retain a laboratory as defined in this procedure to conduct urine drug testing in accordance with those parts of the United States Department of Transportation (DOT) Workplace Drug and Alcohol Testing Programs which relate to testing procedures in laboratories.
 - 6.1.1 Additionally, the Company will have alcohol testing conducted by personnel in accordance with the above standards and procedures as they relate to alcohol testing.
- 6.2 The Company will retain third-party administrators to conduct drug and alcohol testing, and in the case of Random Testing, may also use Acuren Safety Advisors to conduct such testing.
 - 6.2.1 Post- Incident and near miss, and observation of employee conduct (reasonable cause) require the use of breath alcohol and urine express tests, and where the latter is non-negative, an oral fluid lab 8 panel and the sample is submitted as per the process identified herein.
 - 6.2.2 Pre-access testing is done in accordance with conditions established pursuant to client contracts.
 - 6.2.3 Random testing will be conducted via an oral swab (8 panel – Lab Analysis) and alcohol breathalyzer. The sample shall be submitted as per the process identified herein.
- 6.3 All laboratories providing drug testing services on behalf of the Company will ensure the testing be performed in such a manner that:
 - 6.3.1 Acceptable forensic practices and quality systems are maintained;
 - 6.3.2 Specimen validity testing is deployed;
 - 6.3.3 Regular independent audits occur; and
 - 6.3.4 Proficiency test samples are included.
- 6.4 By continuing his or her employment with the company the employee accepts the terms of this alcohol and drug policy and authorizes the laboratory to provide the test results to the Company or any person with legal authority to require the disclosure of the test results.
 - 6.4.1 Further, the employee authorizes the Medical Review Officer to provide the test results to a substance abuse professional to whom the employee has been referred under the provisions of this policy.

7.0 ALCOHOL AND DRUG TESTING RESULTS

- 7.1 Alcohol and drug test results can be negative, non-negative, tampered and invalid or inconclusive.
 - 7.1.1 Negative test result means the employee is in compliance,
 - 7.1.2 Non-negative test result means the employee is non-compliant,
 - 7.1.3 A tampered test result means non-compliance, and



- 7.1.4 An invalid or inconclusive test result cannot be relied upon to determine compliance or non-compliance.
- 7.2 All test results will be provided in a confidential written report from the Medical Review Officer (MRO) to the designated company representative(s).
- 7.3 A report from the MRO to the designated company representative that the employee’s sample produced a negative test result means that the employee complied with this procedure. The designated company representative must notify the employee of the negative test result and that no other steps under this alcohol and drug policy will be taken.
- 7.4 A confidential written report from the MRO to the designated company representative that the employee’s sample produced a non-negative test result means that the employee failed to comply with this procedure.
 - 7.4.1 Where the MRO has determined that there is a legitimate medical explanation for the non-negative test result, a fitness-for-work assessment should be undertaken to ensure that the employee complies with fitness for work requirements.
- 7.5 A confidential written report from the MRO to the designated company representative that the employee’s sample has been tampered with means that the employee failed to comply with this procedure.
- 7.6 A confidential written report from the MRO to the designated company representative that the employee’s sample is invalid or inconclusive means that the test cannot be relied upon for the purposes of this procedure.
- 7.7 Where a person is referred to testing required under pre-access by the bargaining agent or labour provider of that person, a confidential written report from the MRO shall be issued to the designated representative of the bargaining agent or labour provider.
- 7.8 In order to preserve the confidentiality of test results, the Designated Regional Representative and any person to whom disclosure is permitted under this alcohol and drug policy must not disclose the test results to any person other than a person who needs to know the test results to discharge an obligation under this alcohol and drug policy.

Concentrations

- 7.9 The concentration limits set out below are used to determine compliance with the alcohol and drug program.
- 7.10 Urine drug concentration limits:

DRUGS OR CLASSES OF DRUGS	Screening concentration equal to or excess of ng/ml	Confirmation concentration equal to or in excess of ng/ml
Marijuana metabolites	50	15
Cocaine Metabolites	150	100
Opiate Metabolites		
• Codeine	2000	2000
• Morphine	2000	2000
• Hydrocodone	300	100
• Hydromorphone	300	100



<ul style="list-style-type: none"> • Oxycodone • Oxymorphone 	100	100
6-Acetylmorphine	10	10
Phencyclidine	25	25
Amphetamines	500	
<ul style="list-style-type: none"> • Amphetamine • Methamphetamines • MDMA • MDA 		250 250 250 250

7.11 Oral fluid drug concentration limits:

DRUGS OR CLASSES OF DRUGS	Screening concentration equal to or excess of ng/ml	Confirmation concentration equal to or in excess of ng/ml
Marijuana metabolites	4	2
Cocaine Metabolites	20	
<ul style="list-style-type: none"> • Cocaine • Benzoyllecgonine 	or	8
Opiate Metabolites	40	
<ul style="list-style-type: none"> • Codeine • Morphine • Hydrocodone • Hydromorphone • Oxycodone • Oxymorphone 		40 40 40 40 40 40
6-Acetylmorphine	4	4
Phencyclidine	10	10
Amphetamines	50	
<ul style="list-style-type: none"> • Amphetamine • Methamphetamines • MDMA • MDA 		50 50 50 50

8.0 SITE ACCESS TESTING (PRE-ACCESS)

- 8.1 When a client directly or by contract mandates site access testing, the Company will require alcohol and drug testing of any employee as a condition of access to the owner’s property.
- 8.2 Site access testing requires urine and breathalyzer samples be obtained from the employee following the recognized drug testing protocol set out in [Section 6](#).
- 8.3 Individuals who are unwilling to submit to pre-access testing will not be permitted to work on the client site.



9.0 RANDOM TESTING

- 9.1 Random Testing is required by all employees to whom it can lawfully apply who are employed by the company in Safety Sensitive positions.
- 9.2 Random testing is done via an oral swab (8 panel – Lab Analysis) and alcohol breathalyzer. Samples are submitted as per the process identified in Section 6.
- 9.3 Upon forensic analysis, if the sample tests negative, the employee may return to work.
- 9.4 If the sample tests non-negative, the MRO will contact both the employee and the DER to advise of the non-negative test results.
- 9.5 All non-negative test results will be handled in accordance with [Section 15](#).
- 9.6 The forensic method of testing that applies for occupational safety purposes is oral fluid (swab).
- 9.7 In order to test non-negative at the laboratory, the concentration of the drug must exceed the concentration limit noted in [Section 7](#).
- 9.8 The testing process accounts for valid prescription medications. A Medical Review Officer (MRO) reviews all non-negative laboratory results with the employee to verify any valid prescription medications before the results are released to the designated employer representative (DER).
- 9.9 This process ensures the utmost confidentiality around prescription details and addresses the risks that even valid prescriptions pose in safety-sensitive environments.
- 9.10 Where a non-negative result is the outcome of the use of a prescription medication that has not been disclosed to the employer, a review of the employee’s ability to safely perform their work is required, and disciplinary action may also occur for non-compliance with the disclosure requirement.
- 9.11 Random testing appointments will be arranged at the regional level but test results and subsequent follow-up is handled solely through the company’s HR department.
- 9.12 Random testing process:
 - 9.12.1 Each month, a list of employees who are subject to the random testing process will be provided to a certified third party from which they will test approximately 8% of eligible candidates.
 - 9.12.2 Although the intent is to test 100% of employees on the list, it is possible due to the computerized generation of the random list that some employees will not be tested at all and others will be tested on more than one occasion throughout the year.
 - 9.12.3 The third-party will provide the list of names to the corporate human resources administrator for processing.
 - 9.12.4 The corporate administrator will work with the respective regional representatives to coordinate the testing.



- 9.12.5 The candidate is informed that they were selected for Random Testing within two hours of the test appointment time and escorted to the test facility by a designated supervisory representative. Where testing can occur on site, less notice may be provided.
- 9.12.6 Employees who refuse to attend the Random Testing appointment upon notification that their name has been selected will receive a non-negative result and be subject to the disciplinary process, up to and including termination of employment.

10.0 POSSESSION OF ALCOHOL AND DRUGS

- 10.1 A supervisor or manager who has reasonable grounds to believe an employee may be in possession of alcohol or drugs on company property can request a search of the employee's belongings to confirm that he or she is in compliance the Company's alcohol and drug requirements ([section 5.7](#)).
- 10.2 A representative of the Company or the client must provide to the employee the reason for the request under this section.

11.0 OBSERVATION OF EMPLOYEE CONDUCT (REASONABLE CAUSE)

- 11.1 Where a supervisor or manager of an employee has reasonable grounds to believe that an employee is or may be unable to work in a safe manner because of the use of alcohol and drugs, the employee will be required to submit to an alcohol and drug test.

A supervisor or manager of an employee must provide to the employee the reason for the request under this section.
- 11.2 In such circumstances the employee will be required to submit to testing via breath alcohol, urine express, and if the latter is non-negative for THC, the oral fluid lab 8 panel, and the samples are submitted as per the process identified in [Section 6](#).

12.0 INCIDENTS

- 12.1 A supervisor or manager of an employee must request an employee to submit to an alcohol and drug test if the employee:
 - 12.1.1 Was involved in a near miss or incident at work; or
 - 12.1.2 Has been in an incident which resulted in lost days, restricted duties or medical treatment;
 - 12.1.3 Has been in a motor vehicle accident while driving on behalf of the Company;
 - 12.1.4 Received a first aid which may provide reasonable cause for testing.
- 12.2 A supervisor or manager of an employee must provide to the employee the reason for the request under this section.
- 12.3 A supervisor or manager must make a request immediately following an incident unless it is not practicable or reasonable to do so until a later time.



- 12.4 In such circumstances the employee will be required to submit to breath alcohol and urine express tests, and where the latter is non-negative for THC, the oral fluid lab 8 panel, and the sample is submitted as per the process identified in [Section 6](#).

13.0 SELF-HELP

- 13.1 Employees are encouraged to seek help if they believe they suffer from a substance dependency.
- 13.2 Through the Company's Employee & Family Assistance Programs (EFAP's) employees have access to Substance Abuse Professionals (SAPs) to assist in these matters.
- 13.3 An employee who believes that he or she may be unable to comply with the alcohol and drug policy should seek help by:
 - 13.3.1 Contacting the regional HR designate to request access to the Employee & Family Assistance Program and referral to an SAP.
 - 13.3.2 Informing a family member or friend and asking for assistance in contacting the regional HR designate.
 - 13.3.3 Informing a co-worker, a supervisor, or a representative of the company, the bargaining agent or labour provider to which the employee may belong of his or her wish to obtain the support available through the Employee & Family Assistance Program.
- 13.4 In responding to an employee's request for help, a supervisor or manager must:
 - 13.4.1 Inform the employee of the assistance available under the Employee & Family Assistance Program and encourage its' use.
 - 13.4.2 Inform the regional HR designate of the employee's request for support in order to provide appropriate follow-up. .
- 13.5 The direct supervisor or manager must inform the employee that if he or she fails to utilize the Employee & Family Assistance Program the company may require the employee to submit to any or all of the items below
 - 13.5.1 A medical assessment conducted by a physician,
 - 13.5.2 Alcohol and drug testing as set out in [section 11](#)).
 - 13.5.3 An assessment conducted by the Medical Review Officer (MRO) or a Substance Abuse Professional (SAP).
- 13.6 An employee who fails to meet the requirements above may be subject to the termination of his or her employment.
- 13.7 An employee who accesses the Employee & Family Assistance Program as a result of his or her use of alcohol and/or drugs must comply with the terms of the recommended program as a condition of his or her continued employment.
- 13.8 An employee who is at work and participating in a program must comply with the alcohol and drug requirements.



14.0 ASSISTANCE OF A REPRESENTATIVE

- 14.1 A representative of a bargaining agent or labour provider of which an employee is a member and with whom the employer has a bargaining relationship may assist the employee with any matter arising under this alcohol and drug policy if the employee wishes to have the assistance of a representative.
- 14.2 A representative of a bargaining agent or labour provider of which an employee is a member and with whom the employer has a bargaining relationship, may attend any meeting or discussion which takes place under this alcohol and drug policy if the employee wishes the representative to attend and the attendance of the representative does not unduly delay the time at which the meeting or discussion takes place.

15.0 CONSEQUENCES FOR FAILURE TO COMPLY WITH THE ALCOHOL AND DRUG POLICY

- 15.1 In the case of an employee who fails to comply with this policy, the Company may impose progressive discipline, up to and including termination of employment for cause. The appropriate consequence depends on the facts of the case, including the nature of the violation, the record of the employee, the seriousness of the violation, and the willingness of the employee to participate in available rehabilitation programs.
- 15.2 Prior to the Company's final decision with regard to disciplining or terminating the employment of an employee who has failed to comply with the alcohol and drug policy,
 - 15.2.1 The Designated Regional Representative shall direct the employee to and the employee shall meet with a SAP.
 - 15.2.2 The SAP shall conduct an initial assessment of the employee and make appropriate recommendations which will be provided in a confidential report to the Designated Regional Representative. Failure by the employee to attend the assessment shall be cause for termination of the employee.
 - a) During the period of assessment and corrective rehabilitative programs recommended by the SAP the employee shall be deemed to be suspended from his or her employment without pay.
 - 15.2.3 Based on the report provided by the SAP the Company shall determine the appropriate corrective action.
 - a) If the employee requires support to address a bona fide addiction, he or she will be required to follow the course of rehabilitation that is recommended by the SAP;
 - b) If the employee is deemed to have used the substance causing non-compliance with this process in a recreational manner, the Company will impose progressive discipline up to and including termination of employment.
- 15.3 An employee who is required to attend a rehabilitation program will not be permitted to return to work until such time as the Company receives:

- 15.3.1 A certificate issued by the rehabilitation program service provider certifying that the employee has successfully completed its rehabilitation program and continues to comply with all the requirements of the rehabilitation program.
- 15.3.2 Verification from a licensed physician with knowledge of substance abuse disorders certifying that the employee is able to safely perform the duties he or she will be required to perform if employed by the company.
- 15.3.3 A statement signed by the employee and, if represented by a bargaining agent or labour provider, by the bargaining agent or labour provider acknowledging that the person agrees to any conditions imposed as part of a corrective rehabilitative program and such other reasonable conditions set by the employer. The employer may terminate the employment of the employee who fails to comply with these conditions.

15.4 Client responses to violations

- 15.4.1 The client or owner of a site where a Company employee was found to have been non-compliant with the alcohol and drug requirements ([section 5.0](#)) may give the employee a written notice that he or she may no longer enter the client or owner's site.
- 15.4.2 The client or owner is not obliged to give an employee who is prohibited from entering their site another opportunity to work there.

16.0 EDUCATION

- 16.1 The Company is committed to informing employees of the existence of this policy and to taking such other steps as are reasonable to inform its employees of the safety risks associated with the use of alcohol and drugs and the assistance available as defined in this policy.
- 16.2 The Drug and Alcohol program will be included in the Company orientation that employees receive as part of the Company training procedure.
- 16.3 The Company will make its EFAP contact information readily accessible for its entire workforce and sub-contractors.

17.0 SUBSTANCE ABUSE AWARENESS

17.1 Supervisor Awareness

Supervisors are expected to be sensitive to changes in the behaviour or performance of their employees and inquire when there is a reasonable chance it may be related to alcohol or drug use even when outside of the workplace and,

- 17.1.1 Be familiar with the available supports available for union and non-union employees within the Company.
- 17.1.2 Where a supervisor believes that a worker's performance or behaviour problem is related to alcohol or drug use outside the workplace, it is recommended that they contact their Regional Human Resources Representative for assistance.



17.2 Worker Awareness

Workers have a duty to report any unusual behaviour or activity among their colleagues to supervision, along with the details of their observations.

18.0 EMPLOYEE & FAMILY ASSISTANCE PROGRAMS (EFAP)

18.1 Employee & Family Assistance Programs are available to all Company employees

18.1.1 The Employee & Family Assistance Program for Non-Union is available from Morneau Shepell through extended health benefits and can be accessed via:

- a) www.workhealthlife.com
- b) By calling 1 800-387-4765

18.1.2 Please contact your human resource representative for further information.

18.2 EFAP for QCCC Employees

18.2.1 Union employees may contact DA Townley to determine eligibility for EFAP at 1-800-663-1356 or speak with a union representative about entering a union-sponsored rehabilitation program provided by Wilson Banwell Human Solutions or the De Novo Treatment Centre.

19.0 THE USE OF DRUGS OR ALCOHOL AT COMPANY SPONSORED SOCIAL FUNCTIONS

19.1 The Company recognises that there are occasions throughout the course of the year where, as an expression of appreciation for the work that employees do for the Company, social events are organized where alcohol may be served. Participation at such events is strictly voluntary, and where employees choose to consume alcohol, there is an expectation that they will exercise moderation and behave responsibly.

19.2 Where any legal substance is consumed, including alcohol or cannabis, employees are expected to comply with all applicable bylaw and/or broader legal requirements. This includes but is not limited to laws related to driving with a blood alcohol count (BAC) that exceeds the legal limit or while impaired by cannabis, and smoking of tobacco or cannabis in locations that are in violation of regional bylaws.

19.3 The use of illegal drugs at any work-related social event whether on Company premises or not is strictly prohibited.

19.4 Any breach of the above rules may result in disciplinary action under the Company's disciplinary procedure, up to and including termination of employment.



APPENDIX A: THIRD-PARTY ADMINISTRATORS

Acuren Providers:

- CannAmm Inc
 - Direct: 1-800-440-0023
- Surehire
 - Direct: 1 866-944-4473