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	ALCOHOL AND DRUG POLICY	PO-HR-CORP-006	
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## ALCOHOL AND DRUG POLICY

Approved by: Kevin Fleury, President & CEO 25-Mar-2019


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## 1. Purpose

- 1.1 CEDA is committed to the protection of, and the health and safety of our employees and the public. Employees who are under the influence or behave inappropriately due to the consumption of Alcohol and/or drugs not only threaten personal and public safety, but also compromise the quality of our customer service and adversely affect the reputation and goodwill of our company.

This Alcohol and Drug (A&D) Policy outlines CEDA's requirements for A&D testing to reduce the risk of incidents where alcohol and/or drug use may be a contributing factor. It details standards and expectations associated with substance use, as well as requirements for alcohol and/or drug testing that follows the Construction Owners Association of Alberta (COAA) Canadian Model for Providing a Safe Workplace – Alcohol and Drug Guidelines and Work Rule.

## 2. Scope

- 2.1 All CEDA employees and contractors are required to adhere to this A&D Policy while they are engaged in CEDA business.

For union employees, if this A&D Policy contradicts a provision of an applicable collective agreement, the collective agreement shall prevail.

Contractors will be advised of the applicable A&D Policy provisions and will be expected to enforce its requirements for their employees, contractors and agents while engaged in CEDA business.

Contractors must ensure that their employees have complied with pre-access testing requirements and confirm that all employees have a Negative A&D Test prior to commencing work for CEDA. Contractors are responsible for the testing of, and adherence to this A&D Policy by their own employees.

## 3. Responsibilities


### 3.1 CEDA

- Taking all reasonable measures to provide employees with a safe workplace.
- Actively ensuring all applicable CEDA, client and legislative codes, regulations, policies, practices and procedures are followed.
- Providing prevention programs that emphasize awareness, education and training with respect to the use of alcohol and drugs.
- Leading by example.

### 3.2 Supervisors/Leaders

- Being knowledgeable about CEDA's A&D Policy.
- Actively ensuring all applicable CEDA, client and legislative codes, regulations, policies, practices and procedures are followed.
- Reporting to work fit for duty and remaining fit for duty while on company business, premises or worksites.

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- Recognizing the signs and symptoms of potential inappropriate use of Alcohol and Drugs. Refer to the Reasonable Cause Form, found under the Supporting Documents section or as available on the oneCEDA site for assistance on recognizing reasonable cause.
- Identifying and managing employees and contractors who are not fit for duty.
- Investigating possible A&D Policy violations in conjunction with CEDA's Human Resources or Health, Safety and Environment departments.
- Requesting/arranging for an A&D test in situations stipulated in this A&D Policy.
- Maintaining Chain of Custody.
- Ensuring confidential information with respect to this A&D Policy is communicated in consultation with CEDA's Human Resources department.
- Attending Supervisor A&D Awareness Training.
- Where an employee discloses or requests support to address an alcohol or drug issue, escalate the request to Human Resources to arrange support through a Substance Abuse Expert (SAE), Employee Assistance Professional (EAP) or as required, assessment through a Substance Abuse Professional (SAP).
- Treating all employees with dignity and respect and confidentiality.
- Leading by example.

### 3.3 Human Resources (HR) Representatives

- Actively ensuring all applicable CEDA, client and legislative codes, regulations, policies, practices and procedures are followed.
- Provide implementation, direction and ongoing support to operational groups in relation to this A&D Policy.
- Leading by example.


### 3.4 Health, Safety and Environment (HSE) Representative

- Actively ensuring all applicable CEDA, client and legislative codes, regulations, policies, practices and procedures are followed.
- Providing HSE support to operational groups at all times.
- Leading by example.

### 3.5 Employees and Contractors

- Ensuring their own health and safety at work is maintained and avoiding adversely affecting the health and safety of others at their workplace.
- Reporting to work fit for duty and remaining fit for duty while on company business, premises or worksites.
- Reading, understanding and adhering to all applicable CEDA, client and legislative codes, regulations, policies, practices and procedures.
- Notifying supervisors/leaders of persons suspected of being not fit for duty or any other breach of this A&D Policy.
- Cooperating fully during incident investigations where there is evidence indicating contravention of CEDA's A&D Policy.

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- Seeking assistance and following appropriate treatment if there is a current or emerging problem with alcohol or drugs.
- Cooperating with CEDA regarding any accommodation and assistance required.
- Leading by example.

#### 4. Definitions and Acronyms

**Alcohol** is any substance that may be consumed and that has an alcoholic content in excess of 0.5% by volume.

**Alcohol and Drug (A&D) Test** is a test administered in accordance with the A&D Policy.

**BAC** means blood alcohol concentration.

**Chain of Custody** is when a Direct Supervisor and/or an HSE Representative is required to maintain direct contact with an employee or contractor from the time of the initial incident to completion of the A&D Test.

**Client** is the person, group or their delegate in legal possession of a work site that controls the activity on the work site (e.g. licensee, lease holder, or prime contractor).

**Drug** includes any substance, chemical or agent that: the use of or possession of 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 and any non-prescription medication lawfully sold in Canada; and drug paraphernalia.

**Drug Paraphernalia** is any personal property which is associated with the use of any drug, substance, chemical or agent; the possession of which is unlawful in Canada.

**Employee** is any individual employed by CEDA on a permanent full-time or part-time, temporary or casual basis as well as independent contractors and direct service providers of CEDA and subcontractors providing services to CEDA or on behalf of CEDA.


**Fit for Duty** means being able to safely and acceptably perform assigned duties without any limitations due to the use of or after-effects of alcohol, drugs or other substances.

**Illicit Drug** means any drug or substance which is not legally obtainable and whose use, sale, possession, purchase or transfer is restricted or prohibited by law (e.g. street drugs such as cocaine).

**Independent Contractor or Professional Service Provider:** is any individual who holds a separate and independent contract to perform specific services with CEDA.

**Incident** is an occurrence, circumstance, condition or near miss that caused or had the potential to cause damage to a person, property, reputation or the environment.

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**Medical Review Officer (MRO)** is a qualified independent physician who validates A&D test results.

**Medication** refers to a drug obtained legally, either over the counter or through a doctor's prescription.

**Negative A&D Test** is a report from the medical review officer that the employee who provided a specimen for A&D testing did not have an alcohol and/or drug concentration level equal to or in excess of that set out in this A&D Policy.

**Positive A&D Test or Non-Negative** is a report from the medical review officer that the employee who provided a specimen for A&D testing did have an alcohol and/or drug concentration level equal to or in excess of that set out in this A&D Policy.

**Reasonable Cause** refers to any observation of impaired motor skill proficiency, impaired judgment, evidence of possession, visible signs or symptoms of use or unusual conduct or any reliable information provided to CEDA of drug use or consumption of alcohol (either at work or prior to arriving at work) where an employee's ability to safely perform work may be impaired.

**Return-to-Work Agreement** refers to an agreement signed by the Employee and a CEDA representative that outlines the terms and conditions the employee must meet after receiving a Positive A&D test, evaluated as a dependent user and completing treatment, to return to active employment with CEDA.

**Risk Sensitive Position** is a subset of safety sensitive positions that include supervisors, managers and technical experts who may or may not work off-site, but make safety critical decisions and direct on-site employees that are conducting potentially dangerous tasks in inherently dangerous work locations. A full listing of Risk Sensitive Positions are described in Appendix B.


**Safety Sensitive Position** is a position in which incapacity due to drug or alcohol impairment could result in direct and significant risk of injury to the employee, contractor, others or the environment. A full listing of Safety Sensitive Positions are described in Appendix B.

**Substance Abuse Professional (SAP)** is a licensed professional who has received training and experience in the diagnosis and treatment of substance abuse related disorders, and has an understanding of the safety implications of substance use and abuse.

**Tamper** is to alter, meddle, interfere, substitute or change.

**Under the Influence** means exhibiting behaviors consistent with being inebriated or impaired due to alcohol or drug use and have an alcohol and/or drug concentration level equal to or in excess of that set out in this A&D Policy.

**Worksite** is a place at which a person performs work for CEDA or a client.

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## 5. Policy

### 5.1 Alcohol and Drug Work Rules

All employees and contractors must report fit for duty and remain fit for duty throughout their workday or shift. Strict adherence to the following rules is expected.

#### 5.1.1 Alcohol

Possession, distribution, offering or selling of any alcohol is prohibited while on company or client premises or worksite with exceptions indicated in Section 5.2.3. Employees cannot:

- Report to work with an alcohol level equal to or in excess of 0.040 grams per 210 litres of breath (i.e., BAC  $\geq$  0.04% is prohibited).
- Use alcohol after an incident, or until tested or advised by CEDA that a test is not required.
- Tamper with a sample for an alcohol test.

#### 5.1.2 Illicit Drugs

Possession, distribution, offering or selling illicit drugs or drug paraphernalia is prohibited. Employees cannot:

- Report to work or work while under the influence of illicit drugs.
- Tamper with a sample for a drug test.

An employee is considered under the influence and not fit for duty (i.e., positive drug test result) if he or she has a drug concentration equivalent to, or greater than, the amounts set out in Appendix A, which is consistent with the Construction Owners Association of Alberta (COAA) Canadian Model for Providing a Safe Workplace – Alcohol and Drug Guidelines and Work Rule.

#### 5.1.3 Marijuana

Health Canada advises that marijuana/cannabis is known to have cognitive impairing effects that include disturbances in attention, in concentration and in the ability to think and make decisions. Physical impacts could also include impairment of motor skills and perception, altered body perceptions, loss of full control of bodily movements and falls. These impairments will impact an employee's ability to safely work within environments deemed safety or risk sensitive.


Health Canada also advises acute impairment is proven to vary greatly from individual to individual lasting anywhere from 4 – 24 hours after consumption. Further, the Canadian Center for Occupational Health advises that negative effects could last up to 28 days after a very high dose and heavy use. CEDA will ensure precautions are upheld to mitigate actual impacts while at work. All employees must not:

- Report to work with a marijuana metabolites level equal to or in excess of 50 ng/ml for urine screening or 4 ng/ml for an oral fluid screening.
- Possess marijuana or marijuana paraphernalia while at work, client site, vehicle or on CEDA business.

#### 5.1.4 Prescription and Over-the-Counter (OTC) Medication

Employees are expected to use prescribed and over-the-counter medication (including herbal preparations) responsibly. Medications of concern are those that inhibit or may inhibit an employee's ability to perform their job safely.

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The following are prohibited when on company business, company or client premises or worksites:

- Misuse of prescription medications.
- Unauthorized possession of prescribed medications without a legally obtained prescription and unauthorized distributing, offering or selling of prescription medications (trafficking).

When taking prescribed and/or over-the-counter medication, employees will:

- Be compliant with drug concentration limits as set out in Appendix A.
- Investigate, through consultation with their doctor or pharmacist, whether the medication can affect their ability to perform their job safely.
- Use a safe, alternative medication option if available (e.g. non-drowsy formula).
- Request modified duties from their supervisor/leader if the medication can affect their ability to perform their job safely.

CEDA reserves the right to confirm the nature and duration of any required work modifications with the employee's physician, without any breach of physician-patient confidentiality or privacy laws.

## 5.2 Implementation of the Alcohol and Drug Work Rules

### 5.2.1 Safety-Sensitive Positions

Due to the greater risk involved in performing certain functions, some positions have been designated 'Safety Sensitive'. A complete list of Safety Sensitive Roles are listed in C.

All employees must not:

- Report for duty or remain on duty under the influence of alcohol, marijuana or illicit drugs.
- Consume any product containing alcohol or illicit drugs while on duty, including during meals or breaks.
- Report to work or return to work after consuming alcohol or illicit drugs at a social event.

### 5.2.2 Vehicle Use

Employees operating a CEDA owned or leased vehicle, as well as those who rent a vehicle for CEDA business purposes, are prohibited from operating such vehicles either before, during or after work hours following the consumption of any amount of alcohol or illicit drugs.


Employees operating a vehicle that he/she owns or leases, but receives a monthly vehicle allowance or reimbursement for mileage, are prohibited from operating such vehicles during work hours or while engaged in CEDA business after consuming any amount of alcohol or illicit drugs.

### 5.2.3 Exemptions for Alcohol Use and Possession

The use, possession and offering for sale of alcohol are permitted during CEDA celebrations, business functions or in social situations with prior senior leader approval.

Responsible alcohol consumption is permitted at CEDA-sponsored social functions, provided that there is prior senior leader approval and acceptable transportation arrangements have been made.



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Employees are responsible for ensuring that there is a designated driver or alternative transportation available for safe transportation home from any CEDA business or social function. Taxi vouchers will be provided at all CEDA-approved social functions where alcohol is served.

If alcohol is made available to CEDA guests in the course of conducting business, employees must use good judgment and be responsible in hosting others.

#### 5.2.4 ***On-Call or Required to Perform Unscheduled Services***

Employees are expected to be fit for duty if requested to work. If an employee is requested to perform work while under the influence of alcohol, drugs or medication and/or is not fit for duty, it is the responsibility of the individual to advise the supervisor/leader that he/she is unable to report for work so appropriate action can be taken to find an alternate employee.

### 5.3 **Methods of Investigation**

When there are grounds to believe an employee is not fit for duty, the employee will be interviewed by a supervisor or leader and given an opportunity to explain why they are/are not fit for duty.

If the explanation is unsatisfactory and/or the leader believes the employee is not fit for duty, the leader must take one or more of the following actions:

- Further investigate the reason the employee is not fit for duty to determine whether there needs to be a referral for medical attention or if testing for alcohol and drugs is required under this A&D Policy.
- Refer the employee for medical attention if there is an immediate medical concern.
- Direct the employee to submit to an A&D test if there is reasonable cause to believe alcohol or drug use may be a factor in the situation. Refer to the Reasonable Cause Form, found under the Supporting Documents section or as found on the oneCEDA site, for assistance on recognizing reasonable cause.

Under no circumstances will an employee be permitted to return to work if he/she is unfit for duty.

When an employee requires medical attention or is directed to submit to an A&D test, he/she will be provided with transportation and taken to and from the hospital/clinic or collection site. The employee will be temporarily relieved from his/her duties pending completion of an investigation.


#### 5.3.1 **Testing**

Tests will be conducted by an individual trained to adhere to proper chain of custody and quality assurance procedures and by an approved laboratory. A collection site has been designated in each area. CEDA may use one or more methods of drug testing in accordance with applicable law, including the analysis of body fluids and/or other materials such as hair.

A breath alcohol test will be administered wherever possible. A blood-alcohol test may be required if breath-alcohol testing is not available.

To support a safe work environment, CEDA reserves the right to conduct A&D testing. Employees may be subject to the following types of testing:

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#### 5.3.1.1 *Pre-employment Testing*

All employees who are to work in Safety Sensitive Positions are required to take a pre-employment test for the presence of alcohol and drugs in their system. These screening tests will be conducted before the employee reports for work, but after an offer of employment has been made.

A Negative A&D Test result is a condition of being employed by or providing services to CEDA.

If an employment offer is made to an individual applying for a Safety Sensitive Position and that individual: refuses to submit to or provide samples for an A&D test; misses a scheduled A&D test; or has a test resulting in a non-negative result, the individual will have failed to meet a condition of employment and the offer of employment will be withdrawn.

These applicants are permitted to reapply upon fulfillment of conditions imposed by CEDA – but not before the passage of 60 days.

If an employee leaves CEDA for any reason other than with cause and reapplies for employment, re-enters employment or works on rotation (for the purposes of this paragraph collectively means “termination”) and returns within 30 days of their last negative pre-employment test, the employee will be deemed to have satisfied the pre-employment test.

A negative test result is also a condition of an existing Employee being transferred into a Safety-Sensitive Position.


#### 5.3.1.2 *Reasonable Cause Testing*

All employees who are to work in Safety Sensitive Positions are required to take a pre-employment test for the presence of alcohol and drugs in their system. These screening tests will be conducted before the employee reports for work, but after an offer of employment has been made.

The employee will be subject to A&D testing if a leader has reasonable cause to believe that the actions, appearance or conduct of an employee while on duty are indicative of the use of alcohol or drugs.

A Reasonable Cause investigation can be triggered by, but is not limited to:

- Discovery of alcohol, illicit drugs and/or drug paraphernalia on company or client premises, worksites or vehicles.
- Evidence of use of a substance (e.g., smell of alcohol or drugs).
- Observation of, or reliable information provided to CEDA, regarding physical or behavioural signs of impairment.
- An employee’s failure to correct a chronic performance problem that strongly suggests that the employee may be or is under the influence of alcohol and/or drugs at work.
- Unexplained failure to follow critical safety rules or procedures.

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The Reasonable Cause investigation must include completion of the Reasonable Cause Form, found under the Supporting Documents section or as found on the oneCEDA site by the supervisor/leader.

Employees are considered unfit for work and are not permitted to return to company or client premises and worksites until documentation has been received indicating negative alcohol and drug test results.

#### 5.3.1.3 *Post-Incident and Near Miss Testing*

Employees may be subject to post-incident A&D testing after a work-related incident. It may not be necessary to conduct a post-incident test if there is clear evidence that the acts or omissions of an employee were the result of an external contributing factor for which he/she had no control over AND alcohol and/or drug use can be definitively ruled out.

The supervisor/leader is required to complete the Post Incident A&D Test Checklist, as found on the oneCEDA site, for all incidents that did or could have resulted in a potential injury, equipment, vehicle, machinery or property damage (including environmental incidents) of moderate, serious or major severity. For further direction, refer to the Health and Safety Severity Matrix available on oneCEDA.

Grounds for post-incident A&D testing will be required based on a 'yes' response to any of the questions on the checklist or where a client has outlined more stringent A&D testing requirements, they must be followed.

Employees are considered unfit for work and are not permitted to return to company or client premises and worksites until confirmation has been received indicating negative drug and alcohol test results.

#### 5.3.1.4 *Return-to-Work Testing*

An employee must undergo a return to work A&D test if he/she has:

- Received a positive A&D Test for alcohol and/or drugs;
- Completed a treatment program for substance dependence; and/or
- Satisfied the recommendations of a Substance Abuse Professional (SAP) through the Employee and Family Assistance Program (EFAP) or a CEDA designated third party provider.


A negative A&D Test result is required before the employee will be allowed to return to work. A return to work agreement must be also be completed and agreed to by the employee and CEDA.

#### 5.3.1.5 *Follow-Up Testing*

Employees who return to work following completion of an alcohol and/or drug treatment program will be subject to reasonable, unannounced periodic follow-up testing as recommended by the appropriate SAP, and defined in the applicable Return to Work Agreement.

#### 5.3.1.6 *Return from Leave Testing*

An employee in a safety sensitive position returning to work following a 30 day absence, or for a shorter period if specified by the applicable client-site requirement, must undergo a return from leave A&D test. A negative test result is required before the employee will be allowed to return to work.

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#### 5.3.1.7 *Government or Client-Requested or Site-Access Testing*

Under some circumstances, it may be necessary for employees to meet government, client or customer's A&D testing requirements (which may differ from those outlined in this A&D Policy), in order to enter or work in their country, and/or to qualify to work on their projects or to access their work sites.

A government's, client's or customer's alcohol and drug compliance requirements, whether arising from legislation or a policy, are to be fully adhered to by employees to the extent that it imposes a higher standard than this A&D Policy.

Unionized employees may voluntarily join the Rapid Site Access Program (RSAP), which is an alternative to site-access testing at a participating client's or customer's premises, as facilitated by third-party administrators only in the province of Alberta. Opting into the RSAP obligates employees to submit to random testing when working on participating sites and precludes the need for pre-dispatch access testing but in no way alters an employee's obligations and duties under this A&D Policy.

#### 5.3.1.8 *Random Testing*

In any situation where a client directly or by contract requires random testing of any contractor assigned to that site as a condition of ongoing work, the testing will take place on an unannounced basis with selection handled by an independent, qualified Third Party Administrator.

Specifically, employees working in a safety-sensitive or specified position on any Suncor site in the Regional Municipality of Wood Buffalo region will be subject to random alcohol and drug testing procedures according to the Construction Owners Association of Alberta (COAA) Canadian Model for Providing a Safe Workplace – Alcohol and Drug Guidelines and Work Rule. Refer to Appendix C: Suncor Random Drug & Alcohol Testing Program.

### 5.4 **Search of Company Premises**

CEDA reserves the right to search for alcohol and/or drugs or drug paraphernalia, without prior notice, in all CEDA owned or leased vehicles and on CEDA owned or controlled premises, where there is reasonable cause to suspect that there may be prohibited substances in the vehicle or on the premises. Consent to inspections or searches, including on client property, is considered a condition of employment.

### 5.5 **Prevention, Assistance and Rehabilitation**

#### 5.5.1 **Education**


CEDA is committed to informing employees of the existence of this A&D Policy. Employees must read and acknowledge that they have read and understand this A&D Policy:

- When they start work at CEDA, and
- On a yearly basis.

Questions or advice regarding this A&D Policy can be directed to your leader. In addition, an HR Representative is available to assist employees and leaders in the interpretation and administration of the A&D Policy.

CEDA also makes assistance available under the Employee and Family Assistance Program (EFAP).

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#### 5.5.2 **Self- Declaration**

All Employees who believe that they may have a substance dependency are encouraged to voluntarily request support and follow appropriate treatment recommendation from a registered SAE. All employees are required to seek assistance by informing a supervisor or a member of the Human Resources or Safety Teams that they believe they may not be able to adhere to the alcohol and drug Work Rules.

CEDA will ensure support is offered through Employee and Family Assistance Program (EFAP). The employee may be referred to a SAP for an assessment for appropriate treatment recommendations.

An employee requesting help will not be disciplined unless he/she:

- Has failed to comply with the Alcohol and Drug Work Rules described in Section 5.1.
- Has been requested to submit to an A&D test as referred to in subsection 5.3.1.2
- Has been involved in an incident as referred to in sub-section 5.3.1.3.
- Has failed to comply with follow up testing as described in 5.3.1.5

#### 5.5.3 **Assistance and Rehabilitation**

Assistance is available for employees who require support based on:

- Voluntary self-declaration of alcohol or drug dependency (as described in sub-section 5.4.2).
- Positive alcohol and/or drug test results as a consequence of Substance Dependence as determined by a SAP.
- The Employee agreeing to participate and complete the recommended rehabilitation and/or any other treatment which is required, as conditions for the employee to return to work.

### 5.6 **Privacy and Confidentiality**

#### 5.6.1 **Handling**

Employee information will be handled in accordance with CEDA's Employee Privacy Policy.

Personal information, including test results relating to alcohol and/or drug tests, assessment results, information about participation in treatment programs and compliance with return-to-work agreements will be collected, used and disclosed only for reasonable purposes that relate to an employee's employment relationship with CEDA. This will include using and sharing only the information reasonably necessary to:


- Evaluate and determine the need for further assessment, appropriate accommodation requirements or work related consequences (if appropriate).
- Determine the employee's ability to return to work and ensure on-going monitoring of any return to work conditions.

Employee test results will be kept separate from the employee's regular personnel file and will be maintained in a secure location.

Employees are entitled to review the results of the A&D test performed on them at any time.

#### 5.6.2 **Dissemination**

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All results will be kept confidential, except for the release of information in accordance with this A&D Policy and CEDA's Employee Privacy Policy, as well as in situations affecting the health and safety of employees and the public. Results of all pre-employment and return to duty alcohol and/or drug testing will be maintained by CEDA's Human Resources department and pre-access, post-incident and reasonable cause testing results will be maintained by CEDA's Health Safety and Environment department.

Any questions about CEDA's use of personal information may be directed to CEDA's Privacy Officer.

#### 5.7 **Consequences of Failure to Comply with the A&D Policy**

Any violation of this policy may result in discipline up to and including termination of employment. Violations of this policy include, but are not limited to:

- Failure to report for a test.
- Refusal to submit to a test.
- Any attempt to tamper with a test sample.
- A positive A&D Test.
- Failure to comply with the Policy.

Employees that chose to self-disclose a potential alcohol and/or drug addiction after an event, or prior to any required test, random or otherwise, will be considered in breach of this policy.

If an employee discloses a potential alcohol and/or drug addiction, prior to any requirement to test, the employee will be relieved from his/her duties and referred to a SAP. Any disciplinary outcomes, including termination of employment, will be deferred until the conclusion of the SAP assessment is received by the Human Resources department. Failure by the employee to contact the SAP within three working days after the SAP referral will result in termination of employment with cause.

An employee that has a positive A&D test and has been assessed by a SAP and diagnosed by the SAP as anything other than meeting the criteria for substance dependence, will result in termination of employment with cause as a result of the policy violation.


An Employee who refuses to attend an assessment with a SAP and/or required treatment as recommended by the SAP, will result in termination of employment with cause.

An Employee who has a positive A&D test result and confirmed meeting the criteria for substance dependence by the SAP, will not be permitted to return to employment with CEDA until CEDA is provided with written notice certifying that the employee has successfully completed all required return to work conditions.

Failure to adhere to the terms identified in the Return to Work agreement will result in termination of employment with cause.

#### 5.8 **Loss of License/Impaired Driving Charge**

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Employees who operate a CEDA-owned, leased, rented or subsidized vehicle must advise their immediate leader of any loss of their driver's license or impaired driving offence. Impaired driving includes, but not restricted to, testing over the legal BAC in any jurisdiction, driving while impaired, or refusing to provide a sample at the request of a police officer. Failure to report the charge is a violation of CEDA's A&D Policy and Corporate Vehicle Policy.

## 6. Supporting Documents

Document Name	Document Identification	Revision
REASONABLE CAUSE	4-ALL-ALL-0122	1.0

The Reasonable Cause Form can be accessed by clicking the following:

<http://doclib.cedagroup.com/FormCentre/CEDAFORMS/Reasonable%20Cause%20Form.pdf>

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## Appendix A

Effective January 1, 2018, urine drug concentration limits:

Drugs or Classes of Drugs	Screening Concentration Equal to or in Excess of ng/ml	Confirmation Concentration Equal to or in Excess of ng/ml
Marijuana metabolites	50	15
Cocaine metabolites	150	100
Opiates		
*Codeine	2000	2000
*Morphine	2000	2000
6-Acetylmorphine	10	10
Phencyclidine	25	25
Amphetamines/Methamphetamines	500	-
*Amphetamine		250
*Methamphetamines	-	250
MDMA	500	
*MDMA		250
*MDA		250
*MDEA		250

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Effective January 1, 2018, oral fluid drug concentration limits:

Drugs or Classes of Drugs	Screening Concentration Equal to or in Excess of ng/ml	Confirmation Concentration Equal to or in Excess of ng/ml
Marijuana metabolites (THC)	4	2
Cocaine metabolites *Cocaine or Benzoylgonine	20	8
Opiates *Codeine *Morphine *6-Acetylmorphine	40	40 40 4
Phencyclidine	10	10
Amphetamines/Methamphetamines *Amphetamine *Methamphetamines *MDMA *MDA *MDEA	50	50 50 50 50 50

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## Appendix B

### Safety Sensitive Classification Matrix

The matrix shown below illustrates the framework that will be used for assessing whether a position is considered safety sensitive.


#### Work Activities

Describes the potential consequences of the activity or task that will be undertaken by the employee, even if that activity or task will be done infrequently. Moving left to right, choose the section most applicable to the employee.

#### Work Environment


Considers the highest risk or hazard exposure related to the work environment in which the work activities will be performed, as well as the highest consequence environment or location where an employee may perform work, even if it is done infrequently. Moving top to bottom, choose the section most applicable to the employee.

Industry agreements dictate that all construction sites, maintenance sites or turnaround sites, and driving activities are considered safety-sensitive environments. There should be no “potentially safety-sensitive” positions. If an employee shows up in the grey zone of the matrix, carefully evaluate the position to designate them safety-sensitive or not. It is appropriate to take a conservative approach and designate a position safety sensitive if any doubt exists.

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			Work Activities – Specific Exposure to Risks				
			A1	A2	A3	A4	A5
			Regional office-based administration	Non-risk sensitive functional support employees (Finance, HSSE, Quality, Human Resources, Information Technology, etc.)  Regional warehouse support personnel	Risk sensitive functional support employees (Finance, HSSE, Quality, Human Resources, Information Technology, etc.)  In-shop maintenance crews	Field based functional support employees (Finance, HSSE, Quality, Human Resources, Information Technology, etc.)  Labourer (covering all CEDA product lines)  In field service and support groups – HET, Welding, etc.)  Safety watch, hot watch  Non-Operating Pipeline services	Equipment Operators (all service lines, all types)  Operational plant maintenance and turnarounds  Commissioning/startup or decommissioning of larger, higher energy equipment  On-site supervision and technical support
Work environment - general exposure to risks	E1	Non-Operating Locations					
	E2	Minor Risk Operations (identified hazards, low density of workers)  Non chemical CEDA regional warehouse	Non-safety sensitive (typical circumstances)		Potentially safety-sensitive (evaluate specific circumstances, designate either safety-sensitive or non-safety sensitive)		
	E3	Considerable Risk Operation  Chemical warehouse and staging facilities					
	E4	Major Risk Operations CEDA facilities with proximity to moving and highly energized equipment  CEDA facilities with proximity chemical			Safety-sensitive (typical circumstances)		
	E5	Construction sites Turnaround sites					
	E6	Driving (on company business)					
	E7	Remote sites (long emergency response time) Working alone					

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## Appendix C

### Random Drug & Alcohol Testing Program

The purpose of this Random Testing program is to be compliant with client requirements regarding alcohol and drug testing. Further it is to address and minimize the risks in the workplace associated with Alcohol and Drugs and to ensure that all Employees are Fit for Duty.

Our client has identified pressing safety concerns in the Regional Municipality of Wood Buffalo related to Alcohol and Drug use and abuse. Because of the elevated safety risks in this region, Suncor has implemented a Random Testing procedure that identifies a minimum standard to which all Contractors are expected to comply to ensure that the related safety risks are appropriately mitigated.

#### **Procedures**

These site specific procedures apply to all CEDA Employees, including Contractors and Direct Service Providers ("Employee"), who are in a Safety Sensitive Position or Specified Position in the Regional Municipality of Wood Buffalo (RMWB).

#### **1. Random Testing Program**

All Employees working on any Suncor site in the RMWB, in Safety-Sensitive Positions and Specified Positions, are subject to random Alcohol and Drug testing.

The names of Employees included in the random testing program will be maintained in a confidential database (the "Pool").

#### **2. Random Testing Administration**

A representative of CEDA's Human Resource department ("Program Coordinator") will be responsible for administering the random testing program.

Operation Leaders will work with the Program Coordinator to make arrangements to schedule and attend the appointments.

#### **3. Random Testing Selection**

Random selection of Employees to be tested will be generated by a third-party using a computer software that is unbiased, unpredictable and fair.

The random testing selection program will test a minimum of 25% of the eligible Employees every calendar year.


Employee names are randomly selected from the Pool at the beginning of each month using the random selection process described above.

Once an Employee has been selected and tested their name will be immediately returned to the Pool. An Employee may be randomly selected for testing multiple times in any given year.

For the following reasons ONLY an alternate Employee will be randomly selected:

- If the selected employee is no longer on shift and will not be returning by the end of the selection period

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- b) If the selected employee is no longer required to participate in random testing (i.e. transfer to another client site)
- c) If the selected employee no longer works for CEDA.

Operation Leaders will need to provide the Program Coordinator with one of the above reasons, when requesting an alternate Employee.

#### 4. Notification

Operation Leaders will be notified in confidence which Employees have been selected for random testing and they will work with the Program Coordinator to arrange for such Employees to be tested as soon as possible and by no later than the end of that month.

Selected Employees should not be given prior notice of the test.

Testing may occur on any day including holidays or weekends and tests may occur during all shifts, including night shifts.

If a selected Employee is not at work (e.g., off shift, sick, etc.) or is otherwise inaccessible, the Operation Leader will retain the Employee's name in confidence and the Employee will be scheduled for a test when back at work or as soon as it is practical.

#### 5. Refusal

If an Employee refuses to submit to an Alcohol and Drug test, the Employee will be given a short period of time to reconsider. This process should not delay the testing for more than 30 minutes.


#### 6. Testing

CEDA will be following the Canadian Model for random testing. The below are the alcohol and drug tests which will be completed for random testing:

Test Type	Purpose
Breath Alcohol test	To assess if an employee can be returned to work and A&D Program compliance
Urine point of collection (POCT) drug test	To assess whether an employee can be returned to work <ul style="list-style-type: none"> <li>negative urine POCT = employee can be immediately returned to work</li> <li>a non-negative urine POCT = employee is sent home pending oral fluid laboratory confirmed test results</li> </ul>
Oral fluid (swab) laboratory confirmed drug test	To assess A&D Program compliance

Please refer to Appendix A for concentration limits.

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## 7. Test Results and Courses of Action

- a) If the Alcohol and POCT Drug tests are both negative, the Employee is returned to work.
- b) If the POCT Drug test is non-negative the Employee is sent home (arrangements for transportation home must be made) pending the follow-up oral fluid (swab) laboratory testing result and related Medical Review Officer review:
  - i. If the Medical Review Officer confirmed drug test is negative, the Employee is returned to work; or
  - ii. If the Medical Review Officer confirmed drug test is positive, refer to Section 5.7: *Consequences of a Policy Violation* in the Alcohol and Drug Policy for next steps.
- c) If the Alcohol test indicates a BAC:
  - i. A positive Alcohol test result is at or above .04 BAC. Refer to Section 5.7: *Consequences of a Policy Violation* in the Alcohol and Drug Policy for next steps.
  - ii. Subject to 5.2.1 & 5.2.2, an Employee who holds a Safety-Sensitive Position or Specified Position and has an Alcohol test result greater than 0.000 BAC but less than 0.04 BAC will be removed from duty until considered safe to return by their Leader.