

Frontier Log Scaling Ltd.

ALCOHOL & DRUG POLICY

Last Update: January 30th, 2020



CONTENTS

1. PURPOSE	4
2. POLICY OVERVIEW	4
2.1 Application and Scope:	4
2.2 Contractors:	4
2.3 Appendices	4
2.4 Modifications:	5
3. STANDARDS	5
3.1 Fit for Work:	5
3.2 Alcohol & Cannabis	5
3.3 Illicit Drugs & Other Mood Altering Substances	5
3.4 Medications	6
3.5 Employees Requiring Medication	6
3.6 Medical Absence or Work Modification	6
3.7 Formal On-call Situations	6
3.8 Unexpected Call-in Situations	7
4. PREVENTION, ASSISTANCE, REHABILITATION & AFTERCARE	7
4.1 Prevention:	7
4.2 EFAP and Other Resources	7
4.3 Assessment/Rehabilitation	7
4.4 Managing Performance	7
4.5 Request for Assistance	7
4.6 Employees:	7
4.7 Employee Responsibilities	8
4.8 Aftercare	8
4.9 Medical Absence or Work Modification	8
4.10 Confidentiality	8
4.11 Cost Sharing:	8
4.12 Duty to Accommodate	9
5. INVESTIGATIONS, TESTING & REPORTING REQUIREMENTS	9
5.1 Investigations	9



5.2	Alcohol and Drug Testing	9
5.3	Searches for Possession of Alcohol, Drugs or Drug Paraphernalia	10
5.4	Impaired Driving Charge or Suspension	11
6.	SOCIAL SITUATIONS	11
7.	CONSEQUENCES OF A POLICY VIOLATION	11
7.1	General Requirements	11
7.2	Specific Violations:	12
7.3	Referral to a Substance Abuse Professional	12
7.4	Conditions of Continued Employment	12
APPENDIX A: KEY DEFINITIONS		14
APPENDIX B: GUIDELINES ON MEDICATIONS		17
APPENDIX C: ALCOHOL AND DRUG TESTING PROCEDURES		19



ALCOHOL AND DRUG POLICY

1. PURPOSE

Frontier Log Scaling Ltd., and their affiliates (collectively, the “Company or Affiliation Group”). has a legal duty to ensure a safe workplace. We are committed to protecting the health and safety of our Employees, our Contractors and their employees as well as the public and the environment in which we work. It is well understood that the use of Alcohol and Drugs (including Cannabis, Illicit Drugs, Mood Altering Substances and Medications) can impact health and safety, job performance, productivity, the environment as well as threaten the Company’s reputation and cause damage to property.

Recognizing these risks and the safety sensitive nature of our work environment, this Policy sets out the Company’s expectations for the effective management of Alcohol and Drugs in the workplace with a priority on minimizing risk associated with our operations and supporting early intervention as required. This Policy also provides guidance on assessment programs and procedures to ensure employees with disabilities are provided with assistance and appropriate accommodation in employment in accordance with applicable human rights legislation.

This Policy is consistent with our Safety Vision and Principles, which confirms our joint commitment to providing a safe and healthy workplace for everyone, and with our statutory obligations, including those under the Workers’ Compensation Act.

2. POLICY OVERVIEW

2.1 Application and Scope: This Policy applies to all Employees at all times while they are engaged in Company Business, when on Company Premises, and when operating Company Vehicles or equipment. All Employees must be accountable for their actions, including Employees who may have an Alcohol or Drug problem or dependency. Violations of this Policy will result in disciplinary action up to and including termination of employment.

2.2 Contractors: There is a separate Alcohol and Drug Policy Program Requirements for Contractors which Contractors are expected to comply with. These Requirements require Contractors to implement an alcohol and drug policy, and to enforce and apply such policy with their employees, sub-contractors and agents while engaged with the Company.

2.3 Appendices: The appendices below also form an integral part of this Policy.

Appendix ‘A’	Key Definitions
Appendix ‘B’	Guidelines on Medications
Appendix ‘C’	Alcohol and Drug Testing Procedures



- 2.4 Modifications:** This Policy is subject to ongoing review and evaluation, and modifications will be made as deemed necessary by the Company to respond to current circumstances and evolving needs. Employees will be made aware of changes to the Policy by way of email or other established means.

3. STANDARDS

- 3.1 Fit for Work:** To minimize the risk of unsafe and/or unsatisfactory performance due to the use or after-effects of Alcohol or Drugs, Employees are required to comply with the standards set out in this section, and to report fit for work and remain fit at work. Being fit for work means being able to safely and acceptably perform assigned duties without any limitations due to the use or after-effects of Alcohol or Drugs or any other reasons.
- 3.2 Alcohol & Cannabis:** Each of the following are strictly prohibited subject to the few exceptions set out below:
- (a) the consumption, possession, distribution, offering or sale of Alcohol, Cannabis, or related Drug Paraphernalia while at work or reporting for work;
 - (b) reporting to work or remaining at work impaired or potentially impaired by Alcohol or Cannabis from any source or suffering from the after effects of excessive consumption (i.e. a hangover);
 - (c) consumption of any product containing Alcohol or Cannabis when on duty, including during meals or breaks;
 - (d) a positive Alcohol or Cannabis test result as determined through the testing program as set out in section 5 below; and
 - (e) the consumption of Alcohol or Cannabis after a Triggering Event until tested or advised testing is not required.

Exceptions:

- (f) Employees may consume Alcohol after the work day, for example, when on travel status, at a training event or seminar or in any other similar business-related situation provided the formal business is completed, they use Alcohol responsibly, and that they are not returning to work that day.
 - (g) Alcohol may be temporarily stored in a factory sealed container in a licensed motor vehicle, provided the Alcohol is locked away or otherwise appropriately secured. Alcohol received as a gift must remain sealed and removed from Company Premises as soon as practical.
- 3.3 Illicit Drugs & Other Mood Altering Substances:** Each of the following are strictly prohibited when reporting to work or being at work:
- (a) reporting to work or being at work while impaired or potentially impaired by Illicit Drugs and other Mood Altering Substances;



- (b) the use, possession, distribution, offering or sale of Illicit Drugs and other Mood Altering Substances or related Drug Paraphernalia; and
- (c) a positive Drug test result as determined through the testing program as set out in section 5 below.

3.4 Medications: Employees are expected to responsibly use all Medications, including those that are prescribed as well as over-the-counter products. Medications of concern are those that impair or potentially impair an Employee's ability to perform their job safely and productively (a guideline on Medications is contained in Appendix 'B'). Each of the following are strictly prohibited when reporting to work or being at work:

- (a) being unfit for work due to the use of a Medication;
- (b) the intentional misuse of Medications (e.g. not using the Medication as it has been prescribed by the doctor or directed by the pharmacy, using someone else's prescription Medication, combining Medication and Alcohol use against direction);
- (c) the possession of prescribed Medications without a legally medically obtained prescription; and
- (d) the distribution or offering or sale of prescription Medications.

3.5 Employees Requiring Medication: Employees who require the use of a Medication are expected to:

- (a) investigate (through their doctor or pharmacist) whether the Medication can impair or potentially impair their fitness for work by explaining their job functions;
- (b) act responsibly and use a safe alternative Medication choice when available (e.g. non-drowsy); and
- (c) if the Medication they are using will impair or potentially impair their ability to perform their job safely, advise their Supervisor before commencing work.

3.6 Medical Absence or Work Modification: If there is any concern about safe or acceptable performance due to Medication use, the Company may hold the Employee out of work until the Employee is deemed fit to return, or may assign the Employee to alternate duties if available and at the discretion of the Company. The Company reserves the right to confirm the nature and duration of any required absence or work modification with the treating physician without any breach of medical confidentiality or privacy laws. This may include requiring the employee's physician to provide a written medical release authorizing ability to work or confirming appropriate work modification.

3.7 Formal On-call Situations: Employees on call are expected to remain fit for duty while on call and must abstain from consuming Alcohol or Drugs and otherwise remain in compliance with this Policy. Where an Employee receives such a call and



is impaired or potentially impaired, they are expected to declare the situation and provide reasons.

- 3.8 Unexpected Call-in Situations:** If an employee is impaired or potentially impaired by Alcohol or Drugs and is contacted by the Company to perform unscheduled services, it is the responsibility of the employee to decline the call-in. If someone is being asked for advice and is impaired or potentially impaired by Alcohol or Drugs, they are expected to declare the situation.

4. PREVENTION, ASSISTANCE, REHABILITATION & AFTERCARE

- 4.1 Prevention:** This Policy stresses the importance of prevention and early identification of potential problem situations. The Company will make information available on health and safety issues associated with Alcohol or Drug use and the process to access assistance.
- 4.2 EFAP and Other Resources:** Employees are encouraged to access assistance through the United Steel Workers' Employee and Family Assistance Program (EFAP), their physician, or appropriate community services for help with problems that may be affecting safe work performance, including ones related to Alcohol and Drug misuse.
- 4.3 Assessment/Rehabilitation:** The Company recognizes that Alcohol and Drug dependency are treatable illnesses and that early intervention greatly improves the probability of a lasting recovery. Anyone who suspects they have an Alcohol or Drug dependency or emerging problem is required to seek advice and to follow appropriate treatment promptly before safe job performance is affected or violations of this Policy occur.
- 4.4 Managing Performance:** The existing process of job performance monitoring will continue to be emphasized. Through this process, individuals with apparent performance problems will be reminded that they should access assistance should a personal problem be affecting their job performance.
- 4.5 Request for Assistance:** Employees who come forward voluntarily for help with an Alcohol or Drug problem will be referred for an assessment by a Substance Abuse Professional (SAP) and supported through a treatment and aftercare program consistent with the SAP's recommendations and within the benefit coverage. Arrangements for the assessment will be made through the Program Administrator.
- 4.6 Employees:** who proactively (i.e., prior to a positive Alcohol or Drug test) come forward voluntarily for help with an Alcohol or Drug problem, or emerging problem, will be supported. Self-disclosure in itself will not be treated as disciplinary.



- 4.7 Employee Responsibilities:** Employees should understand that accessing assistance or declaring a problem does not eliminate the requirement for maintenance of safe and acceptable performance levels and complying with the expectations set out under this Policy. Should discipline or testing be warranted, it cannot be avoided by a request for assistance with a problem or by disclosure that the employee is already involved in a treatment program.
- 4.8 Aftercare:** All Employees who complete primary treatment (e.g. residential or out-patient treatment) for Alcohol and/or Drug problems will be required to participate in an aftercare program when returning to work in order to help them maintain recovery. They will be expected to enter into a written agreement which will outline the conditions governing their return to the job (i.e. a “Return to Duty Agreement”), which may include some or all of the conditions set out in section 7.4 of this Policy, and the consequences for failing to meet those conditions.
- 4.9 Medical Absence or Work Modification:** Where a medical professional, SAP, or other counseling professional advises that there may be a risk that would prevent an Employee from doing their regular job safely or productively, a medical work modification may be issued and the Employee may be assigned to alternate duties if available and at the discretion of the Company. Alternatively, the Employee may be held out of work until he or she is deemed fit to return.
- 4.10 Confidentiality:** Confidentiality will be maintained to the greatest extent possible except where limited disclosure is necessary for related health and safety concerns (e.g. there is deemed to be a potential for risk to self, others or the Company). Only information related to the level of functionality (e.g. fitness for work and any restrictions that may apply) may be shared as required for purposes of determining fitness for work, appropriate work accommodation, and/or return to work requirements.
- 4.11 Cost Sharing:**
- (a) The United Steel Workers maintains an Employee and Family Assistance Program (EFAP) which provides help to Employees who suffer from substance abuse and other personal and emotional problems. The cost of accessing the EFAP is borne by the Company’s health plan, within the limits of the plan.
 - (b) Any subsequent treatment which is not covered by the Provincial health plan, and which is not covered by the EFAP or any other of the Company’s benefit plans, will be borne exclusively by the Employee.
 - (c) Notwithstanding the above, if all of the following conditions are met, the Company will reimburse an Employee for 50% of their treatment and any costs directly related to their treatment up to a maximum of \$1,000 (being the Company’s maximum share) upon presentation of receipts. To be eligible for this reimbursement the Employee must:



- (i) have returned to work and continued working for at least twelve months;
- (ii) have remained in full compliance of their Return to Duty Agreement; and
- (iii) have adhered with the terms and conditions of any program set out by the Substance Abuse Professional.

4.12 Duty to Accommodate

- (a) This Policy does not, in any way, negate the Company's duty to accommodate an Employee whose disability is disclosed through the administration of this Policy or who otherwise makes their condition known to the Company.
- (b) The duty to accommodate is a shared responsibility between the Company and the Employee involved. Refusal by the Employee to participate in required assessment and treatment programs ends the Company's obligation to accommodate the Employee.

5. INVESTIGATIONS, TESTING & REPORTING REQUIREMENTS

5.1 Investigations: The Company will carry out an investigation as part of each reasonable cause and Triggering Event testing circumstance set out below. In each case, prior to testing, the Employee(s) involved will be interviewed in private by their Supervisor and given an opportunity to explain their circumstances. If there are immediate medical concerns, arrangements will be made for appropriate medical attention. Following the interview, the Supervisor will take action appropriate to the situation. This may include referral for an Alcohol and Drug test in accordance with subsection 5.2(a) below where there are reasonable grounds to believe that the actions, appearance or conduct of an Employee is consistent with the use of Alcohol or Drugs. Alcohol and Drug testing may also be required after a Triggering Event in accordance with subsection 5.2(b) below.

5.2 Alcohol and Drug Testing: All Employees are subject to testing in the following circumstances. Further information on the testing procedures is found in Appendix 'C'.

- (a) **Reasonable Cause:** Alcohol and Drug testing will take place where the Company has reasonable grounds to believe that the actions, appearance or conduct of an Employee while engaged in Company Business or on Company Premises is indicative of the use of Alcohol or Drugs. The decision to test will be made by the Supervisor, after consultation with a second Supervisor whenever possible. The referral for a test will be based on specific, personal observations resulting from, but not limited to such indicators as:
 - (i) observed use or evidence of use of a substance (e.g. smell of Alcohol or Cannabis);



- (ii) erratic or atypical behaviour or changes in behaviour;
 - (iii) changes in the speech, odour, behaviour or appearance of the Employee;
or
 - (iv) other observations that suggest Alcohol or Drug use may be a factor.
- (b) **Triggering Event:** Alcohol and Drug testing may be required after a Triggering Event as part of a full investigation into the circumstances unless there is immediate evidence that the actions or omissions of the Employee were not a contributing factor (e.g. structural or mechanical failure, or environmental factors). The decision to refer an Employee, or a group of Employees, for a test will be made by the Supervisor investigating the incident after consultation with a second Supervisor whenever possible.
- Since all Employees involved in a Triggering Event may be subject to testing after a Triggering Event, they are to report any such situation to their immediate Supervisor as soon as possible, to participate fully in any subsequent investigation and to refrain from using Alcohol or Drugs until after testing has been completed or they have been advised that testing is not required. Attempting to avoid a test by failing to report involvement in an incident which may require testing or by avoiding the Supervisor or management following involvement in an incident is a violation of this Policy and will be grounds for discipline up to and including termination of employment.
- (c) **Return to Duty or Follow-Up Testing:** In those situations where employment is continued after a Policy violation, or where an Employee has undergone treatment pursuant to this Policy, Employees will be required to have negative return to duty Alcohol and Drug tests prior to returning to duty and may, as set out in a Return to Duty Agreement and/or in consultation with a SAP, also be subject to unannounced testing as a condition of continued employment and/or as a monitoring tool to support the Employee's recovery.
- (d) **Safety Sensitive Testing:** The Company reserves the right to require Employees assigned to Safety Sensitive duties to undergo Alcohol and Drug testing prior to assignment in order to meet the objectives of these requirements.

5.3 Searches for Possession of Alcohol, Drugs or Drug Paraphernalia: The Company reserves the right to carry out a search when there are reasonable grounds to believe that Alcohol, Drugs or Drug Paraphernalia are present on Company Premises in violation of this Policy. Supervisors are responsible for identifying situations where a search may be justified based on a combination of indicators which could include the Employee's behaviour, odour, or the presence of Drug Paraphernalia. Supervisors are responsible for advising their Supervisor of the situation, who will make the final decision as to whether or not and how to carry out a search of an Employee's personal belongings which may include but is not limited to backpacks, suitcases, lunch bags and containers and vehicles on Company



Premises. Company Vehicles and Company Premises are subject to search at all times without notice.

- 5.4 Impaired Driving Charge or Suspension:** Employees must inform their Supervisor immediately if they have been charged with an impaired driving offense under the Criminal Code of Canada (or other jurisdiction) or have had their license suspended under Provincial legislation (or other jurisdiction) when operating a Company Vehicle or driving on behalf of the Company. Receipt of a charge or suspension in these circumstances will result in a full investigation, and appropriate action, including disciplinary action, will be taken. Failure to report the charge or suspension will be grounds for discipline up to and including termination of employment.

6. SOCIAL SITUATIONS

In the case of any Company social event, appropriate regard will be taken for the safety and well-being of the individuals present and the community.

Responsible Alcohol use is permitted at Company sponsored social events which will be held off of Company Premises and must have the prior approval of the Company Owner. Anyone who attends and consumes Alcohol at such an event must not return to or go to work after the event.

Each event will have a designated "chief host/hostess" who, with the assistance of others, will be responsible for obtaining appropriate permits and ensuring duly qualified and licensed bartenders and servers are in attendance at all times. These bartenders and servers are to be notified that they are solely responsible for ensuring that guests are not overserved.

If Alcohol is made available to guests, Employees are expected to use judgment and be responsible in hosting others.

Employees are expected to use Alcohol in moderation at Company social events and those that use Alcohol in excess, or use Drugs, will be subject to disciplinary action up to and including termination based on their behaviour.

7. CONSEQUENCES OF A POLICY VIOLATION

- 7.1 General Requirements:** Subject to the Company's duty to accommodate to the point of undue hardship, any violation of this Policy will result in discipline up to and including termination of employment. In all situations, an investigation will be conducted to determine whether or not a Policy violation has occurred. The appropriate discipline in a particular case depends on the nature of the Policy violation and the circumstances surrounding the situation; the severity of the violation may warrant entering the disciplinary process at different levels. As with other disciplinary actions, the level of corrective action will progress if infractions are repeated.



7.2 Specific Violations:

- (a) A positive Drug test, a Refusal to Test (as described in Appendix 'A' Key Definitions), and an Alcohol test of 0.04% Breath Alcohol Content (BAC) or higher are each considered to be a violation of this Policy.
- (b) A positive Drug test is one in which the amount of Drug(s) in the sample identified by the confirmation test is at or exceeds the cut-off levels which have been established by the company retained by the Company to conduct confirmation testing.
- (c) A Refusal to Test is considered a positive test.
- (d) An Employee who has an Alcohol test resulting in .02% to .039% BAC, or a non-negative Field Screen test for Drugs in a reasonable cause or Triggering Event situation will be removed from work until considered safe to return (at a minimum not before their next work day or shift) and may be subject to progressive discipline, depending on the circumstances. An employee will be required to undergo a return to work alcohol test upon returning to work and prior to starting their work duties.
- (e) Employees who self-disclose following a positive Alcohol or Drug test will be subject to discipline up to and including termination.

7.3 Referral to a Substance Abuse Professional: After any confirmed violation, the Employee will be referred for an assessment by a SAP to determine whether there is a need for a structured treatment program and the appropriate disciplinary action to be taken. Refusal to meet with a SAP when required is considered a violation of the Policy.

7.4 Conditions of Continued Employment: Should the Company determine that employment will be continued after a Policy violation, the Employee will be required to satisfy conditions issued by the Company. These conditions may include further referral to a SAP to determine whether there is a need for a structured treatment program, submitting return to duty Alcohol and Drug tests (which must be negative) and/or other requirements such as unannounced follow-up Alcohol and Drug testing as determined by a SAP or as set out by the Company, and entry into a Return to Duty Agreement governing their continued employment which may require any or all of the following, or any other condition appropriate to the situation:

- (a) temporary removal from their position;
- (b) adherence to any recommended treatment and aftercare program;
- (c) maintenance of sobriety and satisfactory performance on return to work;
- (d) successful completion of a return to work test;



- (e) ongoing unannounced testing on a frequency and duration as specified in the Return to Duty Agreement; and/or
- (f) no further Policy violations during the monitoring period.

The specific consequences for failure to comply with the Return to Duty Agreement will be set out in the Return to Duty Agreement.



APPENDIX A: KEY DEFINITIONS

1. **Alcohol** refers to beer, wine and distilled spirits, and includes the intoxicating agent found in medicines or other products.
2. **Breath Alcohol Content (BAC)** means the alcohol in a volume of breath as expressed in terms of grams of alcohol per 210 litres of breath as indicated by an evidential breath test.
3. **Cannabis** is the scientific name for the hemp plant. Its leaves and flowers contain a psychoactive (mind altering) resin that can affect how a person feels, thinks and acts. It comes in various forms including dried leaves and flowers (Marijuana), pressed resin (hash), and concentrated resin extracted with a solvent (hash oil) and it can also be vaporized into a mist or consumed as an edible.
4. **Company Business** refers to all activities undertaken by Employees in the course of the Company's operations, whether conducted on or off Company Premises and includes time spent travelling to or from Company Premises.
5. **Company Premises** includes but is not limited to all land, buildings, property, installations or other work sites, whether owned, leased, or otherwise operated or controlled by the Company, operated under the direction of the Company, or under the Company operating authority.
6. **Company Vehicle** includes any machine that transports people or cargo and includes but is not limited to land based motor vehicles whether licensed or not (e.g. cars, trucks or heavy equipment), railed vehicles, watercraft (ships, boats, tugs, barges) and aircraft.
7. **Contractor** refers to any person or entity, including their employees, who have been contracted, sub-contracted, or otherwise engaged to provide services to the Company on a fee for service basis.
8. **Drug** means any substance, including Cannabis, Medications, Illicit Drugs or other Mood Altering Substances, the use of which has the potential to change or adversely affect the way a person thinks, feels or acts. For purposes of this Policy, Drugs of concern are those that impair or potentially impair a worker's ability to perform his or her job safely and productively.
9. **Drug Paraphernalia** means any personal property which is used in association with the use of Drugs (other than devices used for the administration of a legally prescribed medication), and includes any product or device the purpose of which is to tamper with a testing sample or otherwise defeat a Drug or Alcohol test.
10. **Employee** includes all regular full time, part time, temporary, casual and seasonal employees of the Company including those seconded to the Company.



11. **Illicit Drug** means any Drug or substance whose use, sale, possession, purchase or transfer is restricted or prohibited by law (e.g. street Drugs such as cocaine and some cannabis products).
12. **Medication** refers to a Drug obtained legally, either over-the-counter or through a doctor's prescription or appropriate authorization that impair or potentially impair a worker's ability to perform his or her job safely and productively.
13. **Mood Altering Substance** refers to any other product that is legally or illegally used, resulting in cognitive or physical limitations that impair or potentially impair a worker's ability to perform his or her job safely and productively (e.g. synthetic marijuana, cathinone derivatives commonly known as "bath salts", doda, glues, aerosols, and other similar products).
14. **Program Administrator** is the Company's Safety Coordinator who is responsible for ongoing management of the Policy.
15. **Refusal to Test** includes each and any of the following:
 - a. failure of an Employee to report directly for a test without a valid explanation;
 - b. an outright refusal to submit to a test;
 - c. failure to provide a valid specimen absent of a documented medical condition;
 - d. a confirmed attempt to tamper with a test sample;
 - e. refusal to agree to disclosure of a test result to the Program Administrator or the Substance Abuse Professional as required;
 - f. attempting to avoid a test by failing to report involvement in an incident which may require testing or by avoiding management following involvement in an incident;
 - g. failure to advise of release from a medical facility if testing is delayed for medical reasons;
 - h. failing or refusing to attend a medical evaluation where required; and
 - i. any attempt to disrupt the testing process including threatening collection site staff.
16. **Substance Abuse Professional (SAP)** is an individual with knowledge of and clinical experience in the diagnosis and treatment of Alcohol and Drug related disorders. The Substance Abuse Professional will assess if the Employee has an Alcohol or Drug dependency, make any recommendations regarding education and treatment, and recommend a return-to-duty monitoring program including unannounced testing.
17. **Supervisor** refers to the individual accountable for a particular area or shift, including managers, and others in supervisory positions who are directly responsible for overseeing and/or giving direction to an Employee.



18. Triggering Event means:

- a. a fatality;
- b. an injury to a person which is recordable under the Company's Health and Safety Manual and is not solely a "First Aid" nor "Medical Aid" case. In other words:
 - i. Lost Time: an injury which results in time off on one or more days, not including the day of injury;
 - ii. Restricted Work: where an injury required that job duties be modified; and
 - iii. Medical Treatment: an injury beyond the scope of the first aid attendant;
- c. an "environmental occurrence" as defined in the Company's Environmental Management System (EMS)) (e.g. any event which by law is required to be reported to authorities such as the Ministry of Forests, Lands and Natural Resource Operations (MLNRO), Ministry of Environment (MOE), Department of Fisheries and Oceans (DFO) or other appropriate agency);
- d. a loss in revenues or damage to property, equipment or vehicles in excess of \$2,500; or
- e. an incident which resulted in a first aid, medical aid or serious incidents that could have resulted in a recordable incident.



APPENDIX B: GUIDELINES ON MEDICATIONS

1. All Employees are expected to avoid potential impairment during working hours due to the legitimate use of Medications. The Medications set out below have been associated with performance impairment and are provided as a guideline to Employees in assessing their own situation. The list is not exhaustive; there are numerous other over-the-counter and prescription Medications which when taken may impact negatively on performance.
2. Therefore, Employees are expected to consult with their personal physician or a pharmacist to determine if use of the Medication will have any potential negative impact on job performance by explaining their job function. If the Medication they are using will affect their ability to operate safely and productively, they are expected to advise their Supervisor in advance.
3. If there is any concern about safe performance, the Employee may be held out of work until deemed fit to return, or a medical work modification may be issued and the individual may be assigned to alternate duties if available and at the discretion of the Company. The Company reserves the right to confirm the nature and duration of any required work modification without any breach of medical confidentiality.
4. Medications:
 - (a) Antihistamines – are widely prescribed for hay fever and other allergies (e.g. Allegra, Dimetane). They are also found in many cold Medications. These Medications may cause drowsiness.
 - (b) Motion Sickness Drugs – are used to prevent motion sickness and nausea (e.g. Gravol, Antivert). Side effects may include drowsiness.
 - (c) Barbiturates, Sedatives, Hypnotics, Tranquilizers, Antidepressants – are used to treat sleep disorders and depression (e.g. Ativan, Imovane, Paxil). Potential side effects may include mild sedation, hypnotic state, dizziness or drowsiness.
 - (d) Narcotics – (e.g. Demerol, Codeine, Oxycodone). Codeine is often found in combination Drugs such as 222s or 292s or Tylenol 1,2,3s. Drowsiness, dizziness, and light-headedness may be side effects.
 - (e) Opioid Agonist Treatment (e.g. methadone, suboxone, buprenorphine) – are prescribed to treat opioid use disorder and chronic pain. The use of these may result in drowsiness, dizziness, and light-headedness and may impact reaction time and cognitive functioning.
 - (f) Stimulants – Medication used for central nervous system stimulation and for appetite suppression can produce sensations of well-being which may have an adverse effect



on judgment, mood and behaviour (e.g. amphetamines or Medications sold as "diet pills").

- (g) Anticonvulsants – are used to control epileptic seizures and can cause drowsiness in some patients (e.g. Dilantin).
- (h) Muscle Relaxants – are used to treat musculoskeletal pain (e.g. Flexeril, Robaxial). Most common side effects are sedation and drowsiness.
- (i) Cold Tablets/Cough mixtures – in particular night time remedies can cause drowsiness (e.g. Sinutab, Contac, Triaminic, Tussionex and preparations containing dextromethorphan (DM) or codeine).
- (j) Medical Cannabis/Marijuana – Health Canada confirms it is not an approved medicine, and does not endorse its use. However, the new Access to Cannabis for Marijuana for Medical Purposes Regulations allow physicians to authorize use of marijuana for treatment purposes. The College of Family Physicians of Canada has recommended members restrict its use to a small subset of serious medical conditions, and only after other therapies have been tried. Its use, whether legal or illegal and consumed in any form and at any concentration, can present serious negative impacts on one's performance and ability to perform work safely.



APPENDIX C: ALCOHOL AND DRUG TESTING PROCEDURES

The Alcohol and Drug testing process is based on rigorous collection, analysis and reporting procedures designed to ensure the accuracy and integrity of the results. The key steps in the testing process are highlighted below, but are not intended to be exhaustive and the Company retains discretion to make reasonable modifications on a case by case basis.

Testing will be conducted in those circumstances outlined under the Policy to determine the presence of Alcohol and Drugs. Testing for additional Drugs may also be required on an individualized basis on the advice of a treatment centre or SAP or a physician in a post-treatment situation.

Where there are grounds to conduct Alcohol and/or Drug testing (whether on a reasonable cause basis or after a Triggering Event and following an investigation as required under the Policy), the following testing procedures will be undertaken:

1. **Employees Tested:** Where testing is conducted in connection with a Triggering Event, Employees referred for a test will only be those who are identified as having been directly involved in the chain of acts or omissions leading up to the Triggering Event.
2. **Oral Swab Field Test:** Where a trained field screener is available, an Alcohol and Drug Oral Swab Field Test will be conducted by a trained field screener. If the Oral Swab Field Test is negative, the employee may return to work. If a trained field screener deems it to be reasonably necessary to rule out the potential of a false negative, a second Oral Swab Field test may be required.
3. **Confirmation Testing:** If the Oral Swab Field Test is “non-negative or presumptive positive” for either Alcohol or Drugs, or if a trained field screener is not available, the Employee will be removed from the workplace, transported to and required to provide samples to the company retained by the Company to conduct confirmation testing, and held out of duty pending the completion of any investigation.
4. **Timing:** Arrangements for testing will be made as soon as possible.
5. **Documentation:** The need for Alcohol and/or Drug testing must be documented as part of the preliminary investigation as soon as practical and by the Supervisor(s) who deemed such testing to be reasonably necessary in the circumstances.
6. **Communication of Test Results:** All test results will be reported directly to the Program Administrator. Except for the release of information in accordance with this Policy and in situations affecting the health and safety of workers and the public, results of all testing will be maintained by the Program Administrator and will be kept confidential unless otherwise required by law or authorized by order of a tribunal or court.

