

1.0 Purpose

Clark Builders, NorthStar Equipment Rentals, Frontier Employees Inc., and Canadian Borealis Construction, herein referred to as CBGOC, is committed to providing a safe, healthy, and productive work environment. We recognize that the use of illicit drugs and the inappropriate use of alcohol, cannabis, medications, and other substances can adversely affect the safety of people as well as job performance and the work environment. It can also place Company Property, operations, and security of our people at risk.

This policy is intended to outline in detail the standards and expectations associated with alcohol and drug use and confirm CBGOC's commitment to minimize risk associated with our operations.

- This alcohol and drug policy promotes: The safety and dignity of our employees,
- The welfare of our employees and their families,
- Protection of the environment, and
- The best interests of the employer, the owner, industry stakeholders and the public.

2.0 Scope

This Policy was developed based on the guidelines established in the Canadian Model for Providing a Safe Workplace Version 6.0 – July 1, 2018 ("the Canadian Model"), as amended from time to time, developed by the Construction Owners Association of Alberta (COAA) and Energy Safety Canada in order to maintain alignment with industry best practices.

It has been established to provide a safe workplace for all employees and those whose safety may be affected by the conduct of employees, and to ensure that all employees are treated fairly and with respect.

This Policy applies to all Employees (as defined in Section 4.0 below). This Policy also applies to Trade Partners performing services with CBGOC. CBGOC expects and requires that all Trade Partners enforce standards which are, at a minimum, consistent with those set out in this Policy in respect of all their employees engaged in Work at a Company Workplace.

There may be additional requirements mandated by an Owner on a project/site specific basis which will be applied to all affected employees and Trade Partners in addition to this Policy.

3.0 Definitions

CBGOC

Clark Builders Group of Companies including Clark Builders, Frontier Employees Inc. NorthStar Equipment Rentals and Canadian Borealis Construction.

Designated Employer Representative (DER)

The person(s) in CBGOC designated with responsibility to manage any Alcohol & Drug Testing conducted under this Policy, including receiving and communicating any Test results.

Drug Paraphernalia

Includes any personal property which is associated with the use of any drug, substance, chemical, or agent, the possession of which is either unlawful or restricted by law in Canada, such as cannabis.

Employee

An individual engaged to perform work for CBGOC at any Company Workplace whether on a construction or maintenance site or in an office and includes:

- A Craft Employee – any tradesperson.
- A Staff Employee – any Employee whose prime function is not the performance of a particular construction or maintenance trade.
- A Potential Employee – an individual who has not yet entered into an employment relationship with CBGOC but who is a candidate for employment with CBGOC.
- A Dependent Contractor - as this term is defined in the Labour Relations Code.

Employee Family Assistance Program (EFAP)

The program arranged by CBGOC to help Employees who may be experiencing personal problems, including but not limited to Alcohol & Drug abuse or dependency.

Incident

An occurrence, circumstance, condition that caused or had the potential to cause (a “near-miss”) damage to person, property, security, or the environment.

Medical Review Officer (MRO)

A licensed physician with knowledge of substance abuse disorders and the ability to evaluate an employee’s Positive Test Results who is responsible for receiving and reviewing laboratory results generated by CBGOC’s Alcohol & Drug Testing program and evaluating medical explanations for certain Alcohol & Drug Test results.

Owner

The person in legal control of a Workplace.

Point of Collection Test (POCT)

An Alcohol & Drug test that may be performed at a Company Workplace using a Health Canada approved device intended for urine assessment only, which is calibrated to the extent possible to measure only levels of Alcohol & Drugs that exceed the concentration limits prescribed in this Policy and which provides near immediate results.

Reasonable Grounds

Information established by the direct observation of the Employee’s conduct or other indicators, including but not limited to the physical appearance of the Employee, the smell associated with the use of Alcohol & Drugs on his or her person or in the immediate area, his or her attendance record, 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.

Return to Work Agreement (RTW Agreement)

An agreement between an Employee and CBGOC specifying the terms and conditions of employment that must be met by the Employee before he/she will be permitted to return to work and following a return, on a continuing basis for a certain period of time after he/she returns to work. Conditions of a RTW Agreement should include the recommendations in a Substance Abuse Expert Assessment.

Trade Partner

A third-party organization that has entered into a contract with CBGOC to perform a specified portion of Work that involves the use of the Trade Partner's employees on a construction or maintenance site or at an office location under control of CBGOC.

Substance Abuse Expert (SAE)

A licensed physician; a licensed or certified social worker; a licensed or certified psychologist; a licensed or certified employee assistance expert; or an Alcohol & Drug abuse counsellor who 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.

Performance Impairing Substances

Illicit drugs, alcohol, cannabis as well as over the counter or prescription performance impairing medications. See Section 6.0 for more detailed information.

Work

Any activity carried out by an Employee while fulfilling his job duties or at the direction of CBGOC and includes training activities and any activity engaged in by an Employee during a break from work while at a Company Workplace.

Workplace

Any location at which a person performs Work for CBGOC, including all real or personal property, facilities, land, building, equipment, containers, vehicles, vessels, boats, and aircraft, whether owned, leased, or used by CBGOC.

4.0 Responsibilities**Senior Management Representative (Offsite)**

- .1 Implement and administer this Policy as part of their obligation to perform Work activities in a safe manner and their obligation to keep their Employees safe.
- .2 Participate in investigations under this Policy.
- .3 Attend Alcohol & Drug Awareness training as required.

Superintendents, Foremen, Supervisors, and Managers

- .1 Implement and administer this Policy as part of their obligation to perform Work activities in a safe manner and their obligation to keep their Employees safe.

- .2 Attend Alcohol & Drug Awareness training to be knowledgeable about the use of Alcohol & Drugs and to be able to recognize the symptoms of the use of Alcohol & Drugs.
- .3 Initiate Reasonable Grounds-based Alcohol & Drug testing as per this Policy; and
- .4 Apply Post-Incident Alcohol & Drug testing as per this Policy.

Health, Safety and Environment (HSE) Representative

- .1 Be knowledgeable of this Policy.
- .2 Support HR, Senior Management Representative, and site supervision in conducting investigations under this Policy, as needed.
- .3 Provide training with respect to the contents of this Policy, as required; and
- .4 Attend Alcohol & Drug Awareness training.

Human Resources (HR)

- .1 Develop, incorporate, and distribute changes to the Alcohol & Drug Policy throughout CBGOC.
- .2 Provide assistance and advice to all stakeholders, internal and external to CBGOC, regarding the interpretation and implementation of this Policy.
- .3 Liaise with the local union management when required.
- .4 Provide training with respect to the contents of this Policy, as required.
- .5 Support the Senior Management Representative and site personnel in conducting Alcohol & Drug related investigations.
- .6 Coordinate Return to Work process for Employees successfully completing an assessment and rehabilitation, where required.
- .7 Liaise with CBGOC Superintendents, Foremen, Supervisors, and Managers conducting Alcohol & Drug Test(s) when required.
- .8 Attend Alcohol & Drug Awareness training as required.

Employees

- .1 Understand this Policy and its intent.
- .2 Take responsibility to ensure their own safety and the safety of others.
- .3 Self-report any usage of drugs or alcohol, which might lead to them being in violation of this Policy prior to any Incident or other violation of this Policy.
- .4 Ensure they comply with this Policy as part of their obligation to perform Work activities in a safe manner.
- .5 Attend for testing and assessments in accordance with this Policy.
- .6 Follow any treatment recommended by an SAE.
- .7 Participate in and comply with any Return to Work plan prescribed in accordance with this Policy.
- .8 Use prescription or over-the-counter drugs responsibly in accordance with directions, be aware of potential side effects and notify their supervisor of any potential side effects that may affect their ability to work safely.
- .9 Encourage peers or co-workers to seek help when there is a breach of this Policy; and
- .10 Report suspected violations of this Policy to their supervisor.

5.0 Work Rule

To minimize the risk of unsafe and unsatisfactory performance, CBGOC strictly prohibits the following activities while present on company property or in the Workplace, while on company business, while

operating a company owned or leased vehicle, or while operating a personal vehicle in the course of employment:

- i. Reporting to work or being at work with prohibited levels of Performance Impairing Substances in their system.
- ii. Using, possessing, or offering for sale any Performance Impairing Substances.
- iii. Using, possessing, or offering for sale any product or device that may be used to attempt to tamper or interfere with the validity of any sample for an Alcohol & Drug Test.
- iv. Refusing to comply with a request made by a representative of CBGOC with respect to this Policy or refusing to comply with a request to submit to an Alcohol & Drug test made under Section 8.0 Alcohol & Drug Testing.
- v. Failing to notify your CBGOC supervisor of any arrest or conviction for an Unauthorized Substance-related offense within three (3) business days of the arrest or conviction.
- vi. Refusing to co-operate with a workplace search or investigation conducted in furtherance and pursuant to this Policy.

Participation in any of the above listed activities will result in disciplinary action, up to and including immediate termination.

CBGOC also reserves the right to remove a Trade Partner from any Company Workplace for failure to comply with these work rules.

.1 Self-Help and the Duty to Self-Report

CBGOC recognizes that alcohol and drug dependency are treatable illnesses and that early intervention greatly improves the probability of a lasting recovery.

It is the worker's obligation to voluntarily request help from their supervisor (or an HR Representative of CBGOC) if they suspect they have a substance dependency or an emerging alcohol or drug problem and may require the assistance provided by a Substance Abuse Expert or Employee Family Assistance Program (EFAP) **prior to** any incident or other violation of this Policy occurring.

A Superintendent, Foreman, Supervisor, Manager, or person in authority to whom a request for Self-Help has been made should immediately contact Human Resources. An Employee requesting help will not be subject to discipline for disclosing a problem. The Employee will be required to participate in a Substance Abuse Program (SAP) assessment through the EFAP. The independent SAP will determine the best treatment plan to mitigate risks, while helping the employee address their substance abuse/addiction problems.

- CBGOC will follow the recommendations of the SAP with respect to treatment (if applicable), plan for return to work and follow-up testing
- An Employee who receives assistance from the EFAP in connection with his or her use of Alcohol &/or Drugs must comply with the terms and conditions of any program established to help the Employee as a condition of his or her continued employment.

The Employee's failure to submit to such requirements, or to disclose a dependency or emerging problem prior to an Incident or other Policy violation, may result in the termination of his/her employment.

6.0 Performance Impairing Substances

The following are considered Performance Impairing Substances under the defined circumstances:

Illicit Drugs

Illicit drugs mean any drug or substance that is not legally obtainable and whose use, sale, possession, purchase, or transfer is prohibited by law, such as cocaine, heroin, methamphetamine, or phencyclidine (*PCP*). This includes drugs or substances which are not legally obtainable without a valid prescription or medical document from a medical practitioner and where the user does not possess a current and valid prescription or medical document for the drug or substance.

Urine and saliva concentration limits for Illicit Drugs are based on the limits as set by the Canadian Model Version 6.0. Please see *Appendix 4: Drug Concentration Limits*.

Alcohol

A liquid that is produced by the natural fermentation of sugars and is the intoxicating constituent of wine, beer, spirits, and other drinks.

In the case of any Executive approved Company sponsored 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 Executive sponsored social functions on or off Company premises. If alcohol is made available to Company employees and/or guests while conducting Company Business (i.e. restaurant meetings), employees are expected to use good judgement and be responsible in hosting others while complying with this Policy.

Cannabis

A dried preparation of the flowering tops or other parts of the cannabis plant, or a resinous extract of it (cannabis resin), smoked or consumed as a psychoactive (mind-altering) drug.

If individuals choose to use or consume recreational cannabis, they are expected to do so responsibly in those situations where it is legally permitted, and to report to work and remain fit for work in compliance with this Policy. Use or consumption of cannabis at Executive sponsored Company social events is prohibited.

If an individual is consuming cannabis with a medical prescription, please see section 6.4 (j) below.

Medications

It is expected that medications, whether prescribed or over the counter, will be used for the medication's intended purpose and in the manner directed by the worker's medical practitioner, pharmacist, or drug manufacturer. Prescribed substances require a personal prescription or authorization from a licensed medical practitioner.

Employees must advise their supervisor of any potentially unsafe side effects associated with the use of prescription or non-prescription medications before starting work. The Employee must comply with any conditions/limitations set by the supervisor. An Employee who is uncertain about the side effects of prescription or non-prescription medication must consult with their physician, pharmacist, or other appropriate health care professional.

The following drug categories 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 drugs which when taken, have the potential to negatively impact performance.

- A. Antihistamines - widely prescribed for hay fever and other allergies (e.g. Allegra, Dimetane, etc.). They are also found in many cold medications.
- B. Motion Sickness Drugs - used to prevent motion sickness and nausea (e.g. Gravol, Antivert, etc.).
- C. Barbiturates, Sedatives, Hypnotics, Tranquilizers, Antidepressants - (e.g. Ativan, Immovane, Paxil, etc.).
- D. Narcotics / Opiates - (e.g. Demerol, Codeine, Morphine, Oxycodone, etc.). Codeine is often found in combination drugs such as 222s or 292s or Tylenol 1,2,3,4s.
- E. 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").
- F. Anticonvulsants - used to control epileptic seizures and can cause drowsiness in some patients (e.g. Dilantin, etc.).
- G. Muscle Relaxants - (e.g. Flexeril, Robaxial, etc.).
- H. Cold Tablets/Cough mixtures - (e.g. Sinutab, Contac, Triaminic, Tussionex and preparations containing dextromethorphan (DM) or codeine, etc.).
- I. Anabolic steroids.
- J. Cannabis or THC containing substances - If an Employee is using or consuming cannabis with a legally obtained valid authorization or permit, they must provide CBGOC with a fitness for work assessment completed by an independent medical professional to ensure the worker can perform their regular duties in a safe manner. These situations will be managed on a case-by-case basis.

7.0 Alcohol & Drug Testing Situations

CBGOC Employees and Trade Partner Workers will be subject to testing in the following situations:

All Trade Partners are expected to follow the direction of the CBGOC representative when Alcohol & Drug testing is requested. Failure to meet these requirements will result in the Trade Partner Worker being removed from the Workplace and denied access to any other CBGOC work sites.

Site Access Testing

When an Owner directly or by contract requires site-access testing, CBGOC may require Alcohol & Drug testing from the Employee as a condition of access to the Owner's property.

Reasonable Grounds Testing

In all situations when there are grounds to believe an Employee may be unable to work in a safe manner as a result of the use of Alcohol and/or Drugs, the employee will be escorted to a safe place, interviewed, and given an opportunity to speak to or refute the basis for the decision to test.

After considering the employee's explanation, if the Supervisor conducting the interview still believes that the employee may be unable to work in a safe manner and after consultation and agreement of a next level of supervision or management (including HR where appropriate), they may take any of the following actions:

- i. Referral for medical attention if there are immediate medical concerns and/or
- ii. Referral for an Alcohol & Drug test if there are reasonable grounds to believe the use of Performance Impairing Substances may be a factor in the situation. See *Appendix 2 (c) - Reasonable Grounds Testing Flowchart* and *Appendix 3 - Reasonable Grounds A&D Testing Checklist*.

In all situations, the Employee shall be informed of the reason for requesting the Alcohol & Drug test and be escorted by a Supervisor to the collection site or hospital/clinic depending on the circumstances. Further, the basis for the decision to test will be documented as soon as possible after the action or observation has taken place. Once the test is complete, the Employee will then be provided transportation to their local place of residence or transferred to the care of another responsible person.

The Employee is not to perform any work-related duties until results of the test have been confirmed. The individual shall be temporarily removed from their duties pending completion of any investigation.

In all situations when there are grounds to believe a Trade Partner or Worker may be unable to work in a safe manner as a result of the use of Alcohol and or Drugs, the above procedure is still followed and the Trade Partner Company representative is notified of the requirement to subject the worker to a Reasonable Grounds Alcohol & Drug test.

Post-Incident Testing

If there is an Incident at work, CBGOC reserves the right to request a post-incident Alcohol & Drug test for employees believed to be involved in the Incident. All individuals are required to cooperate fully during any investigations on work-related incidents. ***Please note, CBGOC defines near-miss events as Incidents and employees believed to be involved in a near-miss event will be subject to testing under the same principles as Post-Incident testing as per this policy.***

Post-incident testing is required for any Incident that has an Actual Potential Severity (APS) Rating of 3 or higher ([Refer to CBGOC HSE Actual Potential Severity Matrix](#)), regardless of signs and symptoms of impairment. The need for a test must be documented as part of the preliminary investigation as soon as practical after the Incident. The supervisor/manager will complete the Post Incident A&D Testing Checklist as part of the process to determine if a post incident A&D test should be requested.

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 Incident, including failure to appropriately respond to

or aggravation of an Incident requiring response. Failure to report an Incident may be considered a violation of this Policy.

Post-Incident testing must take place immediately following the APS Level 3 or higher Incident or near miss unless it is not practicable. A supervisor or designated CBGOC representative will be responsible for transporting the Employee to and from the testing collection site.

The Employee is not to perform any work-related duties until results of the test have been confirmed. The individual shall be temporarily removed from their duties pending completion of any investigation.

The supervisor(s) of the affected Employee(s), in consultation with a next level of supervision or management (including HR where appropriate) are required to be in consultation where there are circumstances that may warrant CBGOC to not perform post-incident Alcohol & Drug testing. There are two such circumstances:

- A. Incidents where there is non-subjective (objective) evidence that the use of an Unauthorized Substance in no way may have contributed to the cause of the Incident. The following are acceptable reasons listed in the Canadian Model not to require Post-Incident testing:
 - i. Acts of God (i.e. wind, weather),
 - ii. Clear mechanical breakdown,
 - iii. Victim of another person's actions,
 - iv. Innocent bystander, and/or
 - v. Victim of operational upset.
- B. If the Incident has an APS Rating of 1 or 2 and there are no signs or symptoms of impairment, then the supervisor in consultation with a second level of supervision or management (including HR where appropriate) may agree that Post-Incident Alcohol & Drug testing is not required.

Possession of Alcohol or Drugs

CBGOC reserves the right to conduct a search for Unauthorized Substances when there are reasonable grounds to believe that these substances, or related paraphernalia, may be present on Company Property. Supervisors are responsible for notifying higher management and HR of any situation where they believe an investigation should be initiated. An investigation will take place if the Supervisor, Manager and HR conclude it is justified. Law enforcement professionals may be involved if required.

In all situations when there are reasonable grounds to suspect a Trade Partner or Worker(s) may be in possession of alcohol or drugs or related paraphernalia, those workers will be subject to the same investigation process.

Unannounced Testing

If required by an Owner contract, CBGOC will implement a lawful computer-generated unannounced Alcohol & Drug testing program in accordance with the procedures set out in the current U.S DOT Workplace Drug and Alcohol Testing Programs in force, in accordance with the Canadian Model.

In the event a lawful unannounced Alcohol and Drug testing program is to be adopted, a written notice shall be provided to any bargaining agent of affected workers of the implementation of unannounced Alcohol & Drug testing at least thirty (30) days prior to implementation of the program at the Workplace.

Return to Work Testing

An Employee who has returned to the workplace after having been suspended or terminated due to a positive Alcohol & Drug test and has complied with the terms of this Policy, will be required to submit to a Return to Work Alcohol and Drug test (returning a Negative result) in compliance with this Policy along with their agreement to complete unscheduled alcohol and drug testing for a period of up to two (2) years from the date of their return, with at least eight (8) tests taking place during this period.

8.0 Alcohol & Drug Testing

All testing for CBGOC Employees will be carried out by a certified Third-party testing agency in accordance with the guidelines presented in this policy and paid for by CBGOC. Trade Partners are responsible for all their own testing in accordance with, at a minimum, the parameters below. See Section 9.0: Alcohol & Drug Test Result Outcomes for consequences of positive tests.

Point of Collection Testing (POCT) will be utilized by the testing agency as the initial assessment to determine whether there are any Performance Impairing Substances present, with lab-based testing being required for all non-negative POCT results and specified levels (if applicable).

CBGOC's minimum standard test will be a POCT 5-Panel Test (w/ Semi-Synthetic Opioid's) and a Breath Alcohol Test, which will detect all the drugs and relevant concentration limits listed in *Appendix 5 - Drug Concentration Limits*. (Source: Canadian Model Version 6.)

CBGOC will utilize oral fluid testing to determine THC concentration levels for post-incident testing and reasonable cause testing.

The site Owner/Client may require extended panel testing or alternative testing methods and workers will be subject to those tests as required.

9.0 Alcohol & Drug Test Result Outcomes

Alcohol & Drug testing can result in the following outcomes:

- i. **Negative:** A report from a Medical Review Officer (MRO) that the Employee who provided a specimen for an Alcohol & Drug Test did not have an Alcohol & Drug concentration level equal to or in excess of the concentration limits set out in this Policy meaning the worker is in compliance; however, the report may include a safety advisory.

Should a test result return with a safety advisory, the HR Representative will discuss the details of the safety advisory with the individual's supervisor. A fitness for work assessment will be completed by an independent medical professional to ensure the worker can return to work in a safe manner. These types of results will be managed on a case-by-case basis by Human Resources and Management.

- ii. **Non-Negative:** A report from an MRO that the Employee who provided a specimen for an Alcohol & Drug Test did have Alcohol & Drug concentration level equal or in excess of the concentration limits set out in this Policy meaning the worker is non-compliant.

Note: For THC, if the screening concentration in the provided urine specimen is equal to or more than 50 ng/ml, the collected oral fluid sample will be sent for laboratory confirmation. If the confirmation concentration of THC in the oral fluid is equal to or more than 2 ng/ml, the THC testing result will be considered positive as per this Policy.

- iii. **Refusal to Test:** The Employee refused to provide a specimen for Alcohol & Drug testing meaning non-compliance.
- iv. **Cancelled Test:** Meaning neither compliance nor non-compliance can be determined.
- v. **Invalid Test:** Meaning something interfered with the testing process.

A non-negative test result, a refusal to test by an Employee, or evidence of an Employee tampering with a sample is considered violation of this Policy and will result in disciplinary action, up to and including termination.

All test results will be provided in a confidential report from the MRO to the Designated Employer Representative (DER) with explanation and directive if required and shall only be disclosed if it is necessary for the proper administration of this Policy and an Employee's employment.

When a worker is awaiting results for Alcohol & Drug tests, they will be suspended with pay at their corresponding base wage and for regular hours worked pending confirmed laboratory results. As per the Policy, if the worker returns a negative test result, they will be contacted and returned to work immediately.

10.0 Policy Awareness

CBGOC is committed to informing Employees of the existence of this Alcohol & Drug Policy and their responsibilities within it through education and such other steps as are reasonable to inform its Employees of the risks associated with the use of Alcohol & Drugs and the assistance available under an EFAP.

Supervisors will provide guidance to Employees regarding the importance of avoiding substance abuse situations and the consequences of non-compliance with this Policy.

Employees who have knowledge of or suspect any violation of this Policy must report the violation to a Management Representative. Failure to do so may result in disciplinary action, up to and including termination of employment.

Employee Training

CBGOC will inform all workers of the Alcohol & Drug Work Rule during HR on-boarding, site specific HSE orientations and safety meetings.

Management and Supervisor Training

Managers and supervisors will be trained and knowledgeable on the Alcohol and Drug Work Rule and their responsibilities within this policy. The following programs are required training for Senior Leadership and all operational personnel (i.e., Managers, Project Executives, Project Managers, Superintendents, Foremen and Lead Heads) and HSE team members.

- CBGOC HSE Part 5 – Incident Management Supervisor/HSE Training (CB-HSE-P5-T1)
- Alcohol & Drug Awareness Training offered through 3rd party vendor

Trade Partner Awareness

CBGOC will inform all Trade Partners of this Policy and the requirement for compliance of their employees on all CBGOC work sites.

11.0 Saving Clause

It is not the intent of CBGOC to violate any laws or rulings or regulations of any government authority or agency having jurisdiction of the subject matter of this Policy, and in the event any provisions of this Policy are held or constituted to be void as being in contravention of any such laws, rulings or regulations, the remainder of the Policy shall remain in full force and effect.

12.0 Policy Review

At minimum, this Policy will be reviewed, and modified if necessary, on the earliest of one of the following scenarios:

- i. If a Joint Health and Safety Committee requests a review of the plan, or
- ii. Every three (3) years.

Appendices

Appendix 1	How to Book a Test
Appendix 2 (a)	Alcohol & Drug Site Access Testing Flowchart (Existing Employees)
Appendix 2 (b)	Alcohol & Drug Site Access Testing Flowchart (New Employee)
Appendix 2 (c)	Reasonable Grounds Testing Flowchart
Appendix 2 (d)	Post Incident Testing Flowchart
Appendix 3	Reasonable Grounds Alcohol & Drug Testing Checklist
Appendix 4	Post-Incident Alcohol & Drug Testing Checklist
Appendix 5	Drug Concentration Limits

1. Who Does the Supervisor/Employer Call to Book a Test?

SureHire can be contact through the following numbers from any of our locations in Alberta, BC or the Northwest Territories:

- **Regular Business Hours:** Monday – Friday from 8:00 am – 5:00 pm, please **call 1-866-944-4473 ext. 1** to speak with a Booking Agent.
- **After Hours*:** Monday – Friday from 5:00 pm – 8:00 am, Weekends and Statutory Holidays, please call **1-866-944-4473 ext. 6** to speak with an After-Hours Agent.

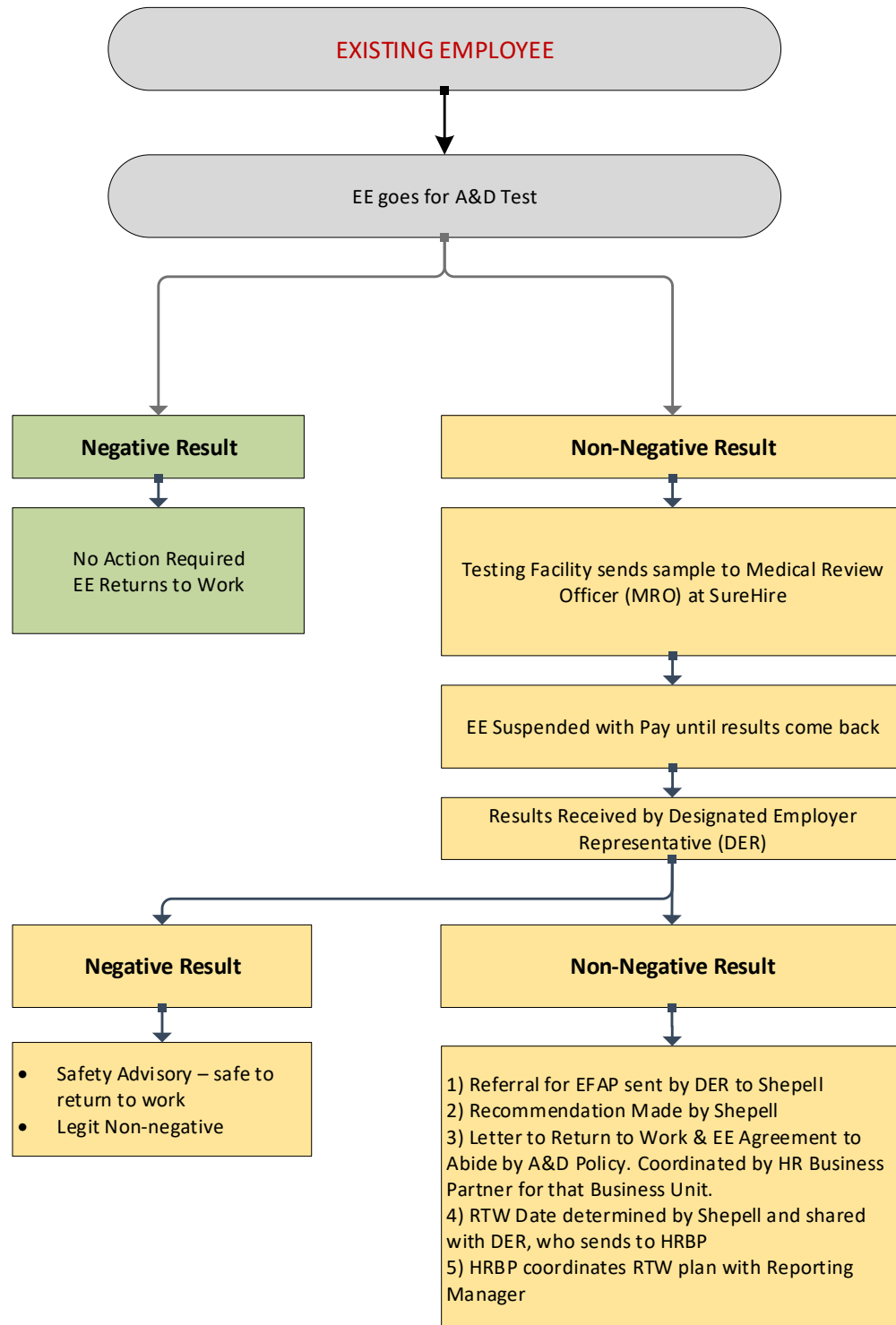
*Statutory holidays are considered After-Hours and additional rates may apply.

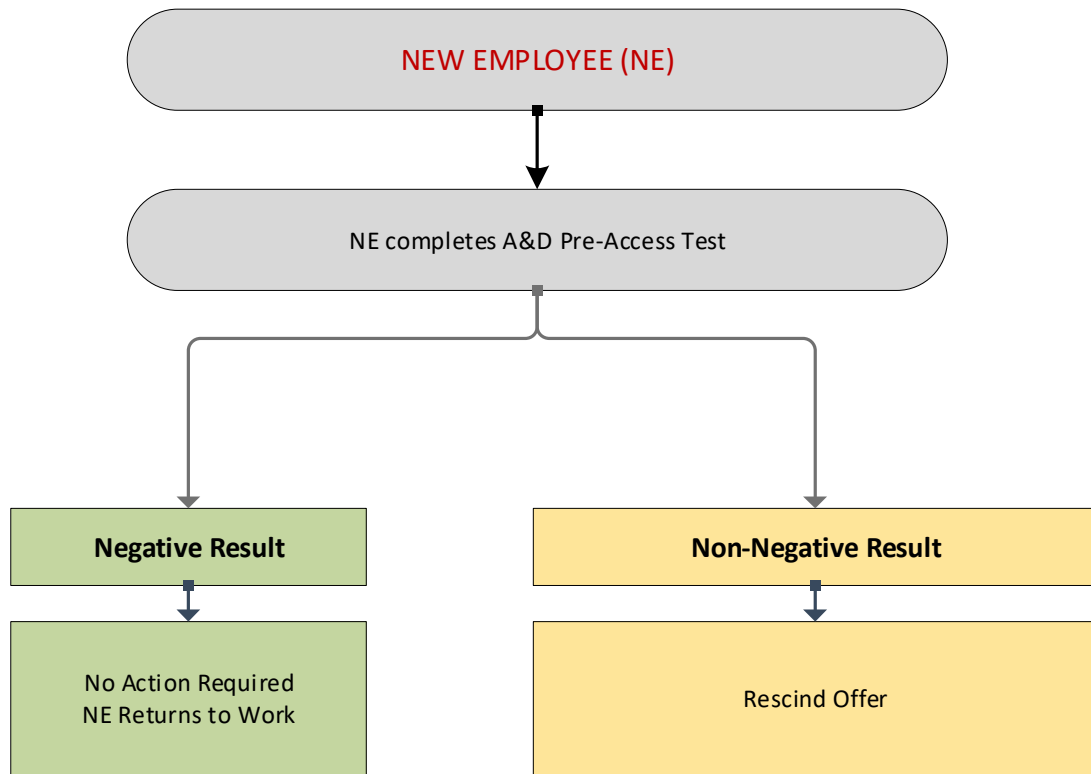
2. What Information Do I Need to Have in Order to Book a Test?

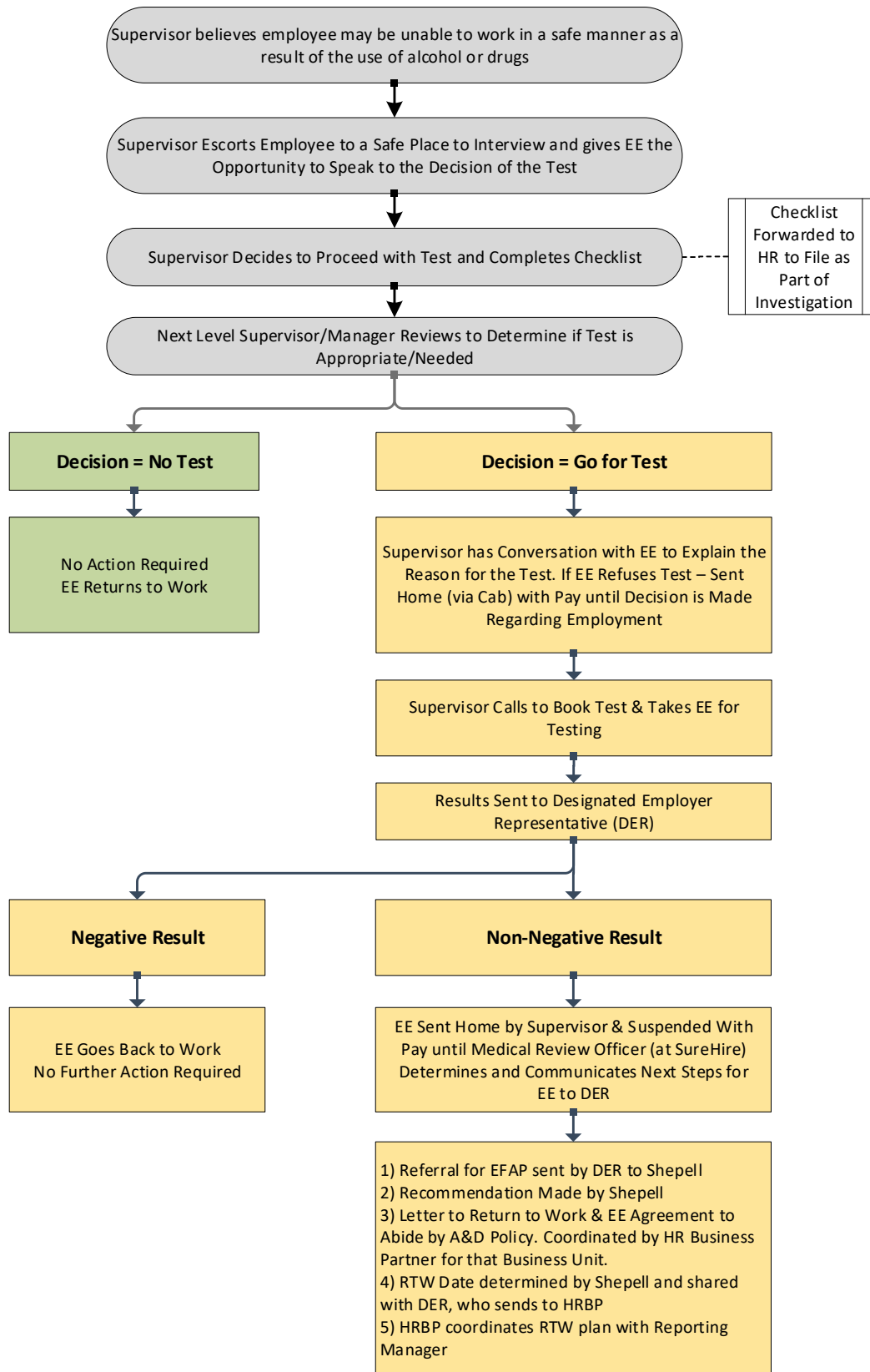
- Company Name
 - Clark Builders Group of Companies (CBGOC) - Clark Builders, Frontier, Northstar Equipment Rentals, Canadian Borealis Construction Inc., and CGT Industrial
- Recruiter/Supervisor/CBGOC Representative Information (as applicable)
 - Your Name (First and last)
 - Phone number
- Reason for Testing
 - Post Incident, Pre-Access, Reasonable Grounds etc.
- Date/Time
 - When testing is needed
- Location Address (if applicable)
 - Site, Street, City/Town
 - Also indicate that testing is required onsite
 - Road conditions
- Site Requirements (if applicable)
 - PPE required?
 - Certifications required?
 - 2 Way radio required?
- Donor Name(s) and Number of Donor(s)
 - Legal first and last name
 - Must also indicate whether donor is over or under 18 years old
- Attending Supervisor or Designated CBGOC Representative Information
 - Supervisor's/ Designated CBGOC's Representative name
 - Supervisor's/ Designated CBGOC's Representative phone number

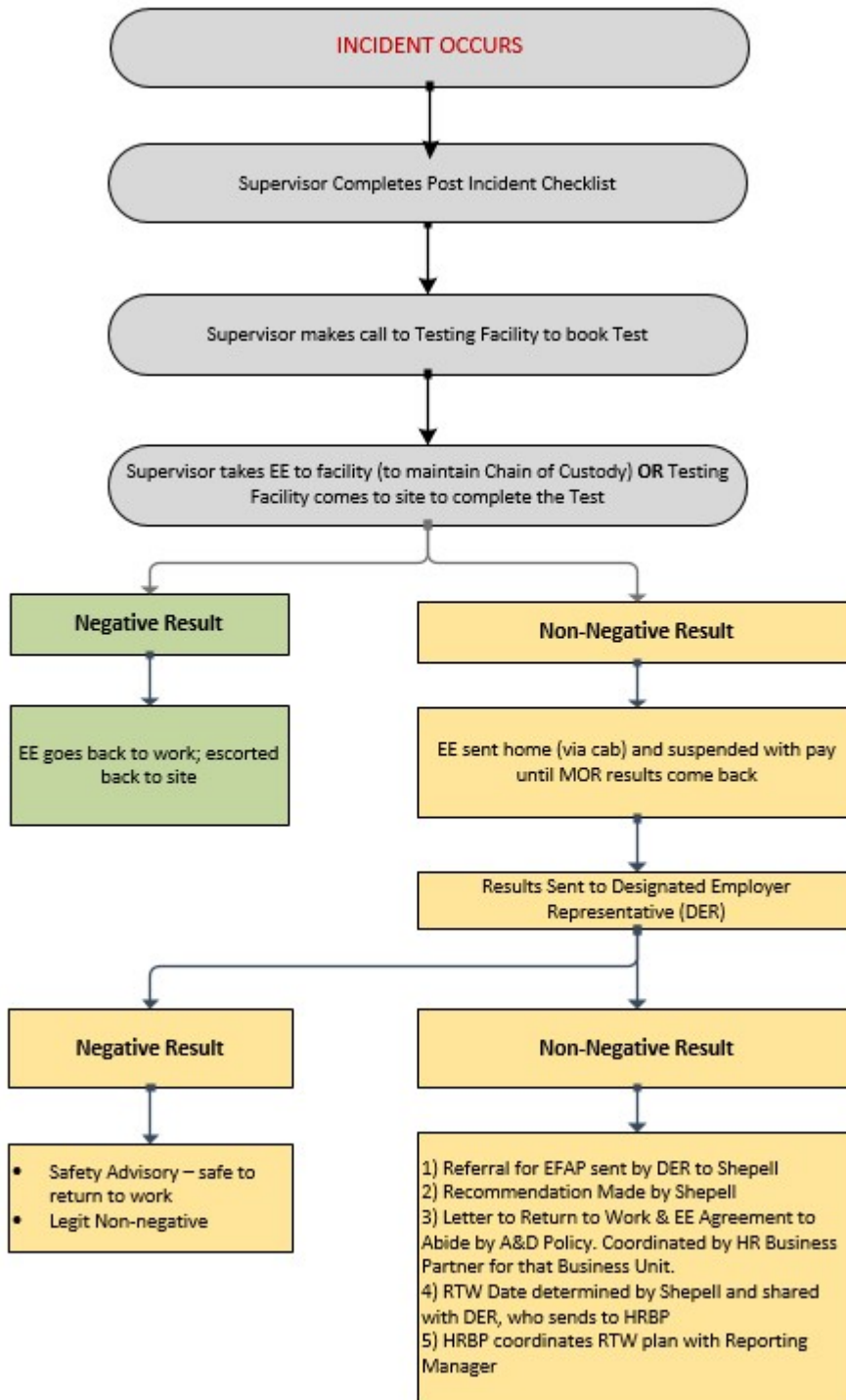
3. Who Will Receive the Results?

- The supervisor of the employee will receive verbal results (Negative/Non-Negative)
 - Supervisor's name if different from above.
 - Supervisor's phone number if different from above.
- Once regular business hours resume, the results will be posted on SureHire's confidential and secure online database and accessible only by the Designated Employer Representative (DER).









Employee Name _____ Project Site Number _____

Date of Investigation _____ Time of Investigation _____

Definition of a *Reasonable Grounds* Alcohol & Drug Test

A Supervisor or Manager of an employee will request that an employee submit to an Alcohol & Drug Test if the Supervisor or Manager and the next level supervisor/manager believe that the employee is or may be unable to work in a safe manner because of the use of alcohol or drugs. Prior to making such a request, the Supervisor or Manager will follow the Investigation Procedure set out below and will complete this Reasonable Grounds Alcohol & Drugs Testing Checklist.

This Checklist is designed to assist in making the determination of whether there are Reasonable Grounds to request an Alcohol & Drugs Test. It should be used even when your investigation determines that Reasonable Grounds do not exist. Where assistance is required, please contact Human Resources or Health, Safety & Environment, departments as appropriate.

Note:

- If the employee has been involved in an APS Level 3 or higher Incident or near miss, testing is required unless there is non-subjective (objective) evidence that the use of an Unauthorized Substance in no way may have contributed to the cause of the Incident (as per the Canadian Model). Use this form post incident only if the employee has been involved in an APS Level 1 or 2 Incident or near miss, and there is objective evidence that the use of an Unauthorized Substance may have contributed to the cause of the Incident.
- Do not use this form if the employee is being investigated for an A&D violation where he or she may have been in possession of alcohol, drugs, or tampering devices. In such situations, there is no need to request an A&D Test to prove the violation.

Supervisor or Manager's Determination if Reasonable Grounds Exist

Select all indicators that exist. One indicator alone may not be sufficient to support a Reasonable Grounds determination. In all investigations, assess all the indicators.

General Appearance	Balance/Walking	Odour
<input type="checkbox"/> Poor hygiene/sloppy dress	<input type="checkbox"/> Stumbling	<input type="checkbox"/> Alcohol odour on breath
<input type="checkbox"/> Runny nose, frequent sniffing	<input type="checkbox"/> Unable to stand, holding on	<input type="checkbox"/> Marijuana odour
<input type="checkbox"/> Tremors	<input type="checkbox"/> Unsteady	
	<input type="checkbox"/> Fidgety	
	<input type="checkbox"/> Impaired fine motor skills	
Speech	Eyes	Face
<input type="checkbox"/> Slurred/incoherent	<input type="checkbox"/> Bloodshot	<input type="checkbox"/> Flushed
<input type="checkbox"/> Slobbering	<input type="checkbox"/> Glassy	<input type="checkbox"/> Pale
<input type="checkbox"/> Unusually loud/soft	<input type="checkbox"/> Very large pupils or pinpoint	<input type="checkbox"/>
<input type="checkbox"/> Excessively talkative	<input type="checkbox"/> Droopy	
<input type="checkbox"/> Unusually silent	<input type="checkbox"/> Watery	Arms
<input type="checkbox"/> Confused		<input type="checkbox"/> Sweaty Arms
		<input type="checkbox"/> Fresh needle marks
		<input type="checkbox"/> Scars or tracks on inner arm
Demeanor/Movement/ Temperament		
<input type="checkbox"/> Nervous	<input type="checkbox"/> Inappropriate emotional outbursts	<input type="checkbox"/> Fumbling
<input type="checkbox"/> Angry or violent	<input type="checkbox"/> Easily upset	<input type="checkbox"/> Unusually withdrawn
<input type="checkbox"/> Threatening or intimidating	<input type="checkbox"/> Hyperactive	<input type="checkbox"/> Extreme variations of mood
<input type="checkbox"/> Argumentative	<input type="checkbox"/> Excessively worried or fearful	<input type="checkbox"/> Abnormal reaction to criticism
<input type="checkbox"/> Excited, agitated, on-edge	<input type="checkbox"/> Crying	
Job Performance	Safety	Absenteeism
<input type="checkbox"/> Forgets instructions or normal procedures	<input type="checkbox"/> Fails to wear safety equipment/PPE	<input type="checkbox"/> Excessive absence (sick or non-sick leave)
<input type="checkbox"/> Works abnormally slowly	<input type="checkbox"/> Ignores required safe practices	<input type="checkbox"/> Unlikely excuses for absences
<input type="checkbox"/> Erratic productivity, wastes materials	<input type="checkbox"/> Takes unnecessary risks	<input type="checkbox"/> Excuse for absence proven false
<input type="checkbox"/> Missed deadlines	Third Party Information	<input type="checkbox"/> Absences follow a pattern with days off
<input type="checkbox"/> Poor judgment	<input type="checkbox"/> Complaint received from co-worker	<input type="checkbox"/> Frequently late returning from breaks
<input type="checkbox"/> Unusually high amount of rework	<input type="checkbox"/> Complaint from client representative	<input type="checkbox"/> Excessive absence from work area
<input type="checkbox"/> Poor housekeeping		

Describe any additional observations not found in the checklist used in determining reasonable grounds:

Did you witness these indicators personally? ☐ Yes ☐ No

If not, are the witness(es) reliable and have they provided firsthand accounts? ☐ Yes ☐ No

NOTE: Obtain written statements from all witnesses and attach them to this form.

Were these observations made today while at the Company Workplace? ☐ Yes ☐ No

NOTE: If not, they might not be grounds to believe the Employee is or may be unsafe to work today.

Did you give the employee an opportunity to explain the indicators above? ☐ Yes ☐ No

If **yes**, write down the employee's explanation here:

If **no**, please explain why:

Supervisor's Determination whether Reasonable Grounds exist:

I, _____, have / do not have a reasonable belief, based on the
(Supervisor or Manager) (Circle One)

indicators above, that the employee named on this form is or may be unable to work safely due to alcohol or drugs (including prescription drugs).

Supervisor or Manager _____
Print Name

Final Decision Whether to Request a Reasonable Grounds Alcohol & Drugs Test

I, _____, have / do not have a reasonable belief, based on the
(Supervisor or Manager) (Circle One)

discussions I have had with the Supervisor or Manager that the Employee named on this form may be unable to work safely due to alcohol or drugs (including prescription drugs).

I have determined that (*check one*):

☐ A&D Testing is required

OR

☐ A&D Testing is not required

Management Representative:

(signature)

(print name)

Please attach witness statements and incident reports and send a copy of this form to Human Resources.

This form is designed to assist Supervisors, Managers and Management Representatives in following the Company's Alcohol & Drugs Policy. This form is not intended to replace or alter the Company's Alcohol & Drugs Standard.

Project Name: _____
Project Address: _____
Employee Name: _____

Project Number: _____
Date: dd/mm/yyyy
Time of Incident: _____

A Supervisor or Manager of an Employee may request that an Employee submit to an A&D Test where the Supervisor or Manager and Next Level Supervision/Management have reasonable grounds to believe that the Employee was involved in an Incident or near miss.

Supervisor or Manager's Determination if a Post-Incident A&D Test Should be Requested

Please check all the appropriate boxes that describe the contributing factors of the incident or near miss:

Incident was due to an Act of God (i.e., Wind, Weather)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Person(s) involved was/were the victim(s) of an operational upset (i.e., failure or malfunction of a production process or system to operate in a normal manner)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Incident was due to a clear mechanical breakdown	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Care and control of the individual(s) is lost (i.e., employee(s) to be tested must be in the care and control of a supervisor until the test is conducted)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Person(s) involved was/were the victim of another person's actions	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Member of the public was responsible	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Person(s) involved was/were an innocent bystander	<input type="checkbox"/> Yes	<input type="checkbox"/> No	The incident is classified as a Level 1 or 2 Actual/Potential Severity	<input type="checkbox"/> Yes	<input type="checkbox"/> No

If you answered "Yes" to any of the items above, post-incident A&D testing will not be conducted.

Supervisor or Manager's Determination whether a Post-Incident A&D Test should be requested:

I, _____ (Supervisor or Manager), have considered the circumstances of the incident and have determined that:

☐ Post-incident Alcohol & Drug testing is required OR ☐ Post-incident Alcohol & Drug testing is not required

Supervisor or Manager: _____ / _____
Print Signature

Date: _____
dd/mm/yyyy

Final Decision Whether to Request a Post-Incident A&D Test:

A Post-Incident A&D Test will be requested where the supervisor or manager conclude that it is required based on the contributing factors of the incident. The next level of management must then determine that there are justifiable reasons to waive the A&D Test.

I, _____ (Next Level supervision/Management Representative), have considered the contributing factors of the incident and have determined that:

☐ Post-incident Alcohol & Drug testing is required OR ☐ Post-incident Alcohol & Drug testing is not required

Next Level Supervisor/Manager: _____ / _____
Print Signature

Date: _____
dd/mm/yyyy

Table 1 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 metabolite	50	15
Cocaine metabolite	150	100
Opioids		
- Codeine	2000	2000
- Morphine	2000	2000
- Hydrocodone	300	100
- Hydromorphone	300	100
- Oxycodone	100	100
- Oxymorphone	100	100
6-Acetylmorphine	10	10
Phencyclidine	25	25
Amphetamines	500	—
- Amphetamine	—	250
- Methamphetamine	—	250
- MDMA ¹	500	250
- MDA ²	—	250

Source: U.S. Department of Transportation, Rule 49 CFR Part 40, January 1, 2018.

1. Methylenedioxymethamphetamine

2. Methylenedioxyamphetamine

Table 2 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 (THC)	4	2
Cocaine metabolite	20	—
- Cocaine or Benzoylcegonine	—	8
Opioids	40	—
- Codeine	—	40
- Morphine	—	40
- Hydrocodone	—	40
- Hydromorphone	—	40
- Oxycodone	—	40
- Oxymorphone	—	40
6-Acetylmorphine	—	4
Phencyclidine	10	10
Amphetamines	50	—
- Amphetamine	—	50
- Methamphetamine	—	50
- MDMA ¹	—	50
- MDA ²	—	50

Source: COAA and Energy Safety Canada, 2018.

1. Methylenedioxymethamphetamine

2. Methylenedioxyamphetamine