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SCOPE: This policy applies to all Dexterra Group employees, divisions, subsidiaries, and joint ventures. This policy shall also apply to consultants, temporary and agency workers, subcontractors and relevant third parties, and anyone on a contract for services.

1.0 POLICY

1.1 Purpose and Objective

Dexterra Group Inc. (also referred to as “Company”) is committed to the health and safety of its Employees, customers, contractors, suppliers, environment, property, and the public

and to maintaining a safe and efficient working environment, while ensuring individuals are treated fairly and with respect.

The use of alcohol and/or drugs can adversely impact business. This can place the integrity, safety, and well-being of our employees, our clients, and others we serve at risk.

The Company continually promotes healthy lifestyles, a no harm safety culture, and environmental responsibility and as such has implemented this Drug and Alcohol Policy to eliminate the negative effects of Alcohol and other Drug use in our workplace.

The Drug and Alcohol Policy addresses the increased risks associated with the use of alcohol and drugs and provides predictable responses when an employee's conduct is in breach of the policy and jeopardizes the safety of the workplace.

1.2 Points of Emphasis

- This policy applies when individuals under the scope are engaged in Dexterra Group business and in a Company or client setting, including when operating vehicles, tools, and equipment.
- This policy is the minimum standard and can be replaced and or amended at anytime based on specific client D&A requirements.
- The Canadian Model for testing is the minimum standard for D&A testing and as such testing can be either urine based or oral fluid based.
- Accessing assistance or declaring a problem with substance use does not eliminate the requirement for maintenance of safe and acceptable performance levels and compliance with this policy.
- The dignity of employees will be respected and there is a priority on treatment, recovery, and support when a problem with substance use is declared.
- Prior to engaging in Dexterra Group business, individuals are expected to proactively disclose the use of alcohol and/or drugs that may render them unfit for duty.
- The Company reserves the right of access to search any employee and their belongings while on work premises to ensure compliance with this policy.

1.3 Prohibited Substances and Activities:

- Using or storing alcohol, cannabis, illicit drugs or drug paraphernalia on Company or client premises or in company vehicles is prohibited,
- The use, possession, cultivation, manufacture, distribution, offer, or sale of illicit drugs or other mood-altering substances, or drug paraphernalia is prohibited,
- Reporting for, or remaining on duty, or on Scheduled On-Call status, under the influence of illicit drugs or other mood-altering substances is prohibited; and/or
- A positive drug / alcohol test result based on the Canadian Model.

1.3.1 Alcohol and Cannabis (non-medical/recreational)

- The following are prohibited:
 - The manufacture, distribution, offer, or sale of an alcoholic beverage or cannabis while on Company business, and on Company or client premises.
 - The use of alcohol or cannabis while on Company business, including when travelling, unless otherwise specified below as an exception.
 - The possession of alcohol or cannabis and or drug paraphilia on Company or client premises, unless otherwise specified below as an exception.
 - Reporting for, or remaining on duty, or on Scheduled On-Call status, under the influence of alcohol or cannabis from any source, including after consuming at a social event (whether sponsored by the Company or not), or consumption of any product containing alcohol or cannabis when on duty, including during meals or other breaks. Employees who have consumed alcohol or cannabis shall not return to work until their next scheduled shift.
 - An alcohol or cannabis test result as identified in section 6.0
 - Consuming alcohol or cannabis, if involved in an incident subject to investigation as described below under Post-Incident Testing section of this Policy, until they have been tested or advised by the Company that a test is not required.
 - The transportation of alcohol or cannabis in a Company vehicle, unless otherwise specified below as an exception.
- Exceptions to the above include the following:
 - The use of alcohol when travelling for business purposes, when at a training event or seminar, or in any other similar business-related situation if the formal business has been completed and the employee is not returning to Company business.
 - If alcohol and/or cannabis is received as a gift, proof that it was a gift should be available and, it must remain sealed and be removed from a Company setting as soon as possible; and
 - Alcohol may be used responsibly at a Company sponsored event which includes any situation where the Company pays for the event expenses. Examples include team building events or business dinners. Also, at externally hosted social events, for example, a charity fundraising event, business mixer, or golf tournament, provided the context of the event pertains to Company business, and only once any formal business has been completed.

1.3.2 Medications

- For the definition of medication, refer to the [Definitions Section](#)
- The Company recognizes that employees may have a clinical need to take prescription and non-prescription medications for their health and well-being.
 - Employees are required to responsibly use all prescription and non-prescription medications in accordance with its intended use, an authorized prescriber's, or manufacturer's instructions, or in the case of cannabis for medical purposes, the medical documentation.
- The following are prohibited for employees while on Company business, and a violation of this policy:
 - the use of medications that inhibit an employee's ability to perform Company business, safely and productively.
 - the intentional misuse of medications (e.g., not using the medication as it has been prescribed, using someone else's prescription medication, combining medication and alcohol use against direction).
 - the possession of prescription medications which were not prescribed to them or cannabis for medical purposes without medical documentation.
 - the unauthorized distribution, offering, or sale of medications.
 - reporting for, or being on duty, while under the influence of a medication that affects one's ability to perform duties safely; and
 - failing to report to a Supervisor or designate the use of a medication that could affect one's ability to perform duties safely.

1.3.3 Scheduled On-Call Situations:

- Company employees are expected to remain fit for Company business and in compliance with this policy when on-call.

1.3.4 Unexpected Call-In:

- If unexpected circumstances arise where an off-duty Company employee is requested to perform unscheduled Company business, it is the responsibility of the employee to:
 - decline the call following the use or consumption of alcohol and/or drugs that render them not fit for company business.

1.3.5 Fitness for Duty

- In the context of this Policy, being fit for duty means being able to perform assigned duties safely and acceptably without any limitations due to the use or after-effects of alcohol, illicit drugs, medications, or mood-altering substances.
- If medication(s) the employee is/are using could impact their Fitness-for-Duty, where no safe alternative medication(s) or treatment choice can be identified, the employee can investigate with their supervisor or designate whether modified or alternative duties are warranted and available to ensure they are able to perform their duties safely.

- Immediately removing themselves from duty and advising their supervisor or designate when feeling any cognitive or physical limitations that could negatively affect their ability to perform their duties safely. The employee will be removed from Safety-Sensitive Position duties until these investigations are complete. If further information is required, with respect to the nature of the Employee's work limitations, illness, medication or treatment plan, the employee shall be asked to provide that information with the assistance of their treating physician. The Company reserves the right, through a third-party medical provider, and without additional consent from the employee, to review this information with their treating physician. The Company reserves the right, through a third-party medical provider, and with the consent of the employee to confirm the nature and duration of modified work requirements with the treating physician, without any breach in medical confidentiality. The required information will first be sought through the employee directly.
- When there is reason to believe an employee is not fit for duty for reasons believed to be related to the consumption or use of alcohol and/or drugs, the employee shall not be permitted to engage in Company Business.
- Steps will be taken to have the employee taken to a safe location and not return to business until deemed fit.

1.3.6 Impaired Driving

- It is prohibited for an employee while on Company Business or in a Company vehicle (owned, leased, or rented) to drive impaired.
- Employees who witness or have reason to believe a driver may be impaired are to report their observations to a supervisor and request for the operator to pull over when safe to do so.

1.4 Prevention, Assistance, Rehabilitation and Aftercare

- **Prevention**

- Information is available on health and safety issues related to Alcohol and Drug use, and the process required to access assistance.
- Employees are encouraged to access the Employee and Family Assistance Program (EFAP), their personal physician, or appropriate community services for assistance with an Alcohol or Drug problem.

- **Assistance/Rehabilitation**

- The Company recognizes that Alcohol and Drug dependencies are treatable illnesses, and that early intervention greatly improves the probability of a lasting recovery. Employees who suspect they have a substance dependency, or emerging Alcohol or Drug problem, are encouraged to seek advice and follow appropriate treatment plans promptly before job performance is affected or violations of this Policy occur.

- **Request for Assistance**

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- Employees who specifically request help with an Alcohol or Drug problem through their Manager, Human Resources, HSEQ, or another Management representative shall be referred for a SAP/E assessment. They shall be supported through a treatment and aftercare program consistent with the assessor’s recommendations, the applicable benefits coverage if available or other resources.
- Employees shall comply with recommended treatment and aftercare programs provided by the SAP/E, and as set out in a Return-to-Duty Agreement with the Company.
- **Responsibilities of Employees**
 - Obtaining assistance or acknowledging a Drug or Alcohol problem does not eliminate the need to maintain safe and acceptable performance levels. Should corrective action or testing be warranted, it cannot be avoided by a request for assistance with a Drug or Alcohol problem, or by disclosing that the Employee is already involved in a treatment program.
- **Aftercare**
 - All Employees who complete primary treatment (e.g., residential, or out-patient treatment) for Alcohol or Drug problems, whether through a request for assistance or after a violation of this Policy, shall participate in an aftercare program recommended by the SAP/E or appropriate addictions professional when returning to duty to help them maintain recovery. Employees shall enter into a written Return-to-Duty Agreement which outlines the conditions governing their return to work and consequences for failing to meet those conditions.
 - In addition, where a medical professional, SAP/E, or other counseling professional advises that there may be a risk that would prevent an Employee from doing their normal job safely, 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.

2.0 DEFINITIONS

This Term:	Means:
Acts and/or Omissions	Actions and/or omissions of an Employee that may be a contributing factor in causing a Significant Incident to occur, and include, but are not limited to: a. Failing to adhere to a standard, code, practice, process, or procedure that is reasonable to expect the Employee to have known or understood. b. Failing to use when required, or improperly use, any tools, equipment, and/or PPE; and c. Recognizing but failing to address a hazard, or failing to recognize a hazard, that a competent worker would have reasonably been expected to recognize and control.
Alcohol	Any substance that may be consumed and that has an alcoholic content in excess of 0.5 percent by volume.
Alcohol and Drug Test	The test administered in accordance with the testing standards in this policy that is used to determine if an employee is in violation of the requirements of this policy.

This Term:	Means:
Company Business	All business activities undertaken by Employees in the course of Company operations, whether conducted on or off Company premises or client premises. It includes situations where an Employee is representing or could reasonably be perceived as representing the Company in the performance of duties.
Drug	Means any drug, substance, chemical or agent, the use or possession of which is unlawful in Canada and US and includes any otherwise legal but illicitly used substance, chemical, Medication, over-the-counter Drugs, Tetrahydrocannabinol (THC)-containing substances, and synthetic forms of illegal substances, the use of which has the potential to change or adversely affect the way a person thinks, feels or acts. For the purposes of the Policy, Drugs of concern are those that inhibit a worker's ability to perform his or her job safely and productively.
Drug Paraphernalia	Any personal property associated with the use of any Drug, substance, chemical or agent, the possession of which is unlawful, including any product or device that may be used to attempt to tamper with a testing sample.
Illicit Drug	Any Drug or substance that is not legally obtainable and whose use, sale, possession, purchase, or transfer is restricted or prohibited by law.
Medication	Refer to any Drug, substance, chemical or agent used for medicinal purposes obtained legally including over-the-counter medications or through a doctor's prescription.
Mood-Altering Substance	Refers to any product that is legally or illegally used, resulting in cognitive or physical limitations that negatively impact performance on the job.
Post-Incident	The period after an incident has occurred when an Alcohol and Drug Test may be conducted.
Reasonable Cause or Reasonable Grounds	Includes information established by the observation of the actions, appearance or conduct of an individual when on duty, reporting of duty or on a scheduled call that are indicative of the use of Drugs or Alcohol, and may include but are not limited to observed use or evidence of use of a Drug or Alcohol, changes in job performance, erratic or atypical behavior, physical appearance or changes in physical appearance, changes in speech patterns, changes in attendance record or unexplained absences during regular work hours, smell associated with Alcohol or Drugs on the individual or in the vicinity, the presence of Alcohol, Drugs or Drug Paraphernalia on the individual or circumstances surrounding a Significant Incident.
Refusal to Test	Refusal to test includes: <ul style="list-style-type: none"> • Failure of an Employee to report directly for a test, and/or refusal to submit to a test • Failure to provide a valid specimen absent a documented medical condition • A confirmed attempt to tamper with a test sample • Refusal to agree to disclosure of a test result • 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 • Failure to advise of release from hospital if testing is delayed for medical reasons • Failing or refusing to attend certification testing where required under the Policy; and • Any attempt to disrupt or impede the testing process.
Return-to-Duty Agreement	A binding written agreement signed by the Employee governing the terms and conditions they must abide by in returning to work after a Drug or Alcohol related incident.
Scheduled On-Call	Specifically designed scheduling, wherein the Employee is assigned set times and dates when they can expect to be called in to work as required by stand-by and excludes situations where an individual's position responsibilities result in the possibility that he/she could be called unexpectedly at any time.

This Term:	Means:
Substance Abuse Professional/Expert (SAP/E)	Means a licensed physician, a licensed or certified social worker, a licensed or certified psychologist, a licensed or certified Employee assistance expert, or an Alcohol and Drug abuse counsellor.

3.0 RESPONSIBILITIES

3.1 Employees

- Report to work fit for duty in all instances.
- Be aware that alcohol and/or drugs must not impact the safe performance of their duties and the Company is committed to support workers in the early prevention and identification of substance use that impacts Company Business.
- If an employee knows someone at work has a substance use problem, they have a personal responsibility to ensure the safety of themselves and others. Part of that responsibility would be to encourage and help that individual seek assistance through an employee assistance service or a supervisor. If that individual is putting him or herself or others in danger, the employee has a responsibility to report that individual to their supervisor.
- Ensure they understand and comply with this Drug and Alcohol policy as part of their obligation to perform work activities in a safe manner. In addition to this policy, employees may be subject to following a client's policy and the requirements laid out in the client's policy.
- Use prescription, including medical marijuana, and non-prescription drugs responsibly, be aware of potential side effects and notify their supervisor of any potential unsafe side effects where applicable.
- Employees are advised to make their physicians or pharmacists aware of their safety-sensitive position and any other medications they may be taking.
- Notify their line manager when there is a breach or potential breach of policy.
- For employees who require a valid driver's license in the performance of their duties must notify their line manager if driving privileges have been lost or suspended due to alcohol or drug use.
- Employees are encouraged to voluntarily request help if they believe they require help for an alcohol and/or drug addiction; and
- Encourage and support colleagues to seek assistance with possible addictions.
- Co-operate with any investigation into a violation of this Policy, including participating in the testing program as, and when required to do so, under this Policy.
- Hold themselves accountable for their own actions by not impacting Company Business through the use of alcohol and/or drugs.

3.2 Line Management

- Be knowledgeable about the Drug and Alcohol Policy, applicable procedures and any client Drug and Alcohol requirements that might apply.
- Ensure they understand and comply with the Drug and Alcohol Policy as part of their

responsibility to perform their work-related activities in an effective and safe manner.

- Be knowledgeable about the use of alcohol and drugs and be able to recognize behaviors and other indicators of the use of alcohol and drugs.
- Consult higher levels of management, Human Resources and/or HSEQ for assistance on potential accommodation cases, including, but not limited to, prescription drugs, including medical marijuana; and
- Don't Walk By and act on reported or suspected alcohol or drug use by employees or other contractors on-site.

3.3 Management and Subcontractors

- Provide a safe workplace.
- Provide programs that emphasize awareness, education, and training with respect to the use of alcohol and drugs; and
- Ensure that all employees understand the existence and content of the drug and alcohol Policy as part of employee orientations to that Company, including testing procedures.
- Ensure arrangements for a Substance Abuse Professional/Expert (SAP/E) assessment if an Employee says they have a problem with alcohol or drugs.
- Approve referrals for an alcohol and drug test in a post-incident or reasonable cause situation as and when required to do so under this Policy.

4.0 SAFETY-SENSITIVE POSITION ("SSP")

At the Company, a number of our positions are considered Safety-Sensitive. A SSP means a position in which the employee has a key or direct role in an operation where if actions or decisions are not carried out properly, it could result in a serious incident affecting the health or safety of employees, contractors, customers, the public, and/or the environment or an inappropriate response or failure to respond to an emergency or operational situation.

Employees who are required to temporarily provide relief in a safety-sensitive position and leaders who directly supervise safety-sensitive positions and who may perform the same duties or exercise the same responsibilities are deemed to hold SSPs as well. SSPs include, but are not limited to, all management and employees who perform the following:

- Involvement in activity of driving (on Company Business).
- Working with or near electrical systems including power lines.

See the Safety-Sensitive Positions Guidance document for more information.

5.0 TESTING

The following table identifies the recommended testing circumstances and applicable positions. A Refusal to Test is a violation of this Policy.

Testing Circumstances	Safety-Sensitive Positions	All other Employees
Safety-Sensitive Position Pre-employment/ Transfer	YES	NO
Reasonable Cause	YES	NO
Post-Incident	YES	YES
Return-to-Duty - Post Violation/Post Treatment	YES	YES
Unannounced Follow-up- Post Violation/ Treatment	YES	YES

5.1 Safety-Sensitive Positions (Pre-Employment and Internal Transfer)

- All external applicants shall pass an Alcohol and a Drug Test.
- In addition, all existing Employees applying for transfer from a non-Safety-Sensitive Position to a Safety-Sensitive Position shall pass an Alcohol and a Drug Test.
- Applicants are not eligible for the position if they refuse to participate in the testing program.
- For Internal Transfer Candidates failure to pass an Alcohol and a Drug test shall:
 - Prevent the applicant for the Safety-Sensitive Position; and
 - Result in a review of the circumstances to determine appropriate action regarding the applicant and their future eligibility for a Safety-Sensitive Position.
- Testing is not required in situations where the Employee is returning to work after a leave of absence or layoff, provided the Employee held a Safety-Sensitive Position under the Policy any time during the previous 90 days.

5.2 Reasonable Cause

- An Investigation will be conducted by an employee’s Supervisor, or a member of Management, when an employee’s performance, actions, appearance, or conduct indicate that there is Reasonable Cause that they may not be Fit-for-Duty.
- Whenever an Investigation concludes there is Reasonable Cause to believe that the Employee is not, or may not be, Fit-for-Duty due to the use of Drugs or Alcohol, the following shall occur.
 - For Safety Sensitive Positions – the results of the investigation shall be reviewed with another Supervisor, or other member of management for concurrence. If both agree with the results, Reasonable Cause Testing shall be required.
 - For all other Employees – The results of the investigation shall be treated as a performance issue to be addressed by the employee’s supervisor in conjunction with Human Resources

5.3 Post-Incident

- Post-Incident Testing may be required for applicable Employees as part of an incident investigation.
- A post-incident investigation shall be conducted for serious and potentially fatal incidents to determine if an Alcohol and Drug Test is required. Whenever an investigation reveals that reasonable factors have been ruled out (e.g., Acts of God, Acts of Terrorism etc.), and that the Employee committed (or may have committed) Acts or Omissions that contributed to the incident, an Alcohol and Drug Test should be required.
- Testing will be conducted as soon as reasonably practicable following an incident.

5.4 Return-To-Duty – Post Violation/Post Treatment

- Post testing, an SAP/E can assess if the Employee has an Alcohol or Drug dependency, make recommendations regarding education and treatment, and recommend an aftercare program which may include a Return-to-Duty Agreement.
- Employees shall be required to pass a Return-to-Duty test when:
 - Employment is continued after a violation of this Policy, or
 - An Employee returns from successful treatment of a self-disclosed Alcohol or Drug dependency.

5.5 Unannounced Follow-Up Testing – Post Violation/Post Treatment

- In situations when employment is continued after a Policy violation, employees shall be subject to unannounced testing as a condition of continued employment as set out in a Return-to-Duty Agreement.
- In addition, unannounced follow-up testing, when recommended by a SAP/E, may be used as a monitoring tool, to support the recovery of any Employee assuming duties after primary treatment for an Alcohol or Drug problem resulting from a request for assistance from Management. This requirement shall be identified in the Employee's written Return-to-Duty Agreement.

5.6 Additional Testing Factors

- Possession of Alcohol or Drugs
 - Where there is reasonable cause to believe that alcohol, drugs, and/or drug paraphernalia are located on Company or client premises, Dexterra Group reserves the right to conduct unannounced searches of work premises, vehicles, tools, and equipment owned, leased, or otherwise controlled by the Company or client.
 - Where reasonable cause exists, a search an Employee's personal property, vehicles, clothing (including pat-down searches), and effects on Company or client premises may occur.
 - Refusal by an Employee to consent to such a search when there is reasonable

cause to conduct one, will be treated as non-compliance with this Policy, and may include performance coaching and corrective action, up to and including termination.

- Supervisors shall identify situations where a search is justified based on a combination of indicators, which include (but are not limited to) behaviour, odour, and/or presence of drug paraphernalia. Supervisors shall consult with Human Resources and/or HSEQ, who, in conjunction with the appropriate member of Management, shall determine if a search shall be initiated.
- Searches conducted at Company or client offices, or operating facilities shall be conducted by the most senior level of Management available at that location with the support of security (if applicable). In certain cases, where consent is refused, police may be requested to carry out the search.

6.0 ANALYTICAL METHODS

If an employee is required to submit to a drug and alcohol test, they will be required to give a sample. The employee being tested will be directed (and transported if necessary) to a collection site, or a collection technician will attend the worksite. The employee must allow the collection site person to inspect them to determine that no items are present which could be used to adulterate a specimen. The employee must give up possession of any item that could be used to adulterate a specimen to the collection site person until the donor has completed the testing process.

The collection technician must establish the identity of the donor.

Employees will be deemed to have produced a non-negative sample if they test above the concentrations noted below.

- With an alcohol level equal to or more than 0.04 grams per 210 liters of breath as determined by a breath alcohol test (BAT)
- "Personnel with a confirmed alcohol concentration of .020 to .039 will be removed from duty immediately and will not be allowed to return to work until the following shift. The employee may be subject to corrective disciplinary action"

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	300
- Hydromorphone	300	300
- Oxycodone	100	100

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
- 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

Oral Fluid 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 Benzoylecgonine	-	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

Refusal to comply with a request to submit to an alcohol or drug test made by a representative of the Company or an attempt to tamper with a sample for an alcohol or drug test will draw an adverse assumption and be deemed a failed test. Disciplinary sanctions are applicable in these instances.

The report to the Company will include whether the test results are negative or positive, as well as if tests have been tampered with or otherwise invalidated.

If the employee has an acceptable explanation that could contribute to a false positive, that will be discussed, and the results amended, if confirmed by a medical professional.

7.0 CONFIDENTIALITY

Confidentiality shall be fully maintained, except where limited disclosure is necessary for related health and safety concerns (e.g., it is deemed a potential for risk to self, others, or the Company). Only the information strictly limited to the level of functionality of an Employee (e.g., Fitness-for-Duty and any restrictions that may apply) shall be shared with Management for purposes of determining whether the Employee is Fit- for-Duty, is assigned the appropriate work accommodation, and/or work designing a Return- to-Duty Agreement.

To preserve the confidentiality of test results, Dexterra Group will not disclose the test results to any person other than a person who needs to know the test results to discharge an obligation under the Drug and Alcohol Policy. The employee who was tested will receive a written report with the test results; this report is confidential.

Line Managers must not disclose any information to any person other than a person who needs to know or as required by law.

8.0 PERFORMANCE COACHING AND CORRECTIVE ACTION

All Employees will have access to this Policy. Deviation from the above terms may result in performance coaching and corrective action, up to, and including termination. Any resulting termination will be considered a "termination with cause" and not subject to notice or remuneration in lieu.

Before disciplinary action is taken an investigation will be conducted to verify that a Policy violation has occurred. Therefore, management has the authority and discretion to hold out of service, with or without pay as may be determined by management, any Employee who is believed to be involved in an incident that could lead to performance coaching and corrective action pending the results of the investigation. The appropriate action in each case depends on the nature of the Policy violation and the circumstances surrounding the situation.

If it is determined that employment shall be continued in a specific circumstance, the Employee shall enter into a written Return-to-Duty Agreement governing their continued employment, which may require any or all of the following actions, or any other additional conditions appropriate to the situation as follows:

- Temporary removal from their position.
- Adherence to any recommended treatment and aftercare program by an SAP/E or qualified addictions expert.
- Maintenance of sobriety and satisfactory performance while on duty.
- Successful completion of a Return-to-Duty test.
- Unannounced testing for a period determined on a case-by-case basis, and
- No further violations of the Policy.

Failure to meet the requirements of the Return-to-Duty Agreement during the

monitoring period may be grounds for termination of employment.

9.0 POLICY REVIEW

Controlled documents are required to be reviewed as required by the IMS or by regulatory requirements as applicable to ensure they:

1. Remain relevant,
2. Cover the scope of our operations,
3. Comply with current legislation and industry best practice.

This policy must be reviewed on an annual basis and a record of this review is documented.

Dexterra Group reserves the right to amend, modify, suspend, or terminate any of its programs (including benefits) and policies covering employees and former employees, including retirees, at any time, including after employees' retirements, without notice by action of its Senior Leadership Team or other committee expressly authorized by the Senior Leadership Team to take such action. The programs, benefits, and policies to which an employee or former employee, including retiree, is entitled are determined solely by the provisions of the applicable program, benefit or policy as amended from time to time.