

Alcohol & Drug Policy

Policy Scope

Regardless of when or where they are used, alcohol and drugs can impair a person's ability to work safely. Our Company is committed to ensuring our worksites and our employees are not put at risk because of alcohol and drug use. To that end, we have developed this Alcohol and Drug Policy with guidance from the *Alcohol and Drug Policy Model for the Canadian Mining Industry*.

Expectations

Everyone who works for and with our Company is expected to understand the risks of alcohol and drug use to workplace safety, and to be able to identify and respond to those risks in compliance with this policy. Employees are expected to comply directly with this policy and any supporting Company programs. Contractors who conduct work on behalf of our Company are expected to develop and enforce comparable policies and programs to manage alcohol and drug risks among their employees.

Commitment

In addressing workplace safety risks caused by alcohol and drug use, our Company's priorities are to:

- Protect the health and wellbeing of our employees;
- Protect the communities in which we operate;
- Protect the interests of the Company's shareholders;
- Meet regulatory requirements for providing a safe workplace;
- Treat employees fairly and with respect;
- Protect the environment;
- Define clear, specific alcohol and drug work rules against which performance can be tested;
- Provide understandable and predictable responses to breaches of this policy;
- Implement alcohol and drug testing as needed to monitor compliance;
- Provide assistance to employees when required; and
- Answer questions and concerns about this policy as needed.

Work Rules

An employee is strictly prohibited:

- **While on Company property or at a Company worksite, to use, consume, possess, distribute, sell or transfer:**

- Alcohol (unless contained in sealed (unopened) packaging, and secured in vehicle for transfer to home or official Company-sanctioned event), or
- Drugs other than those permitted by this policy as described below, or
- Drug paraphernalia, or
- Any product or device that could tamper with any sample for an alcohol or drug test;
- **From reporting to work or performing work:**
 - With an alcohol level equal to or in excess of 0.04 grams per 210 litres of breath,
 - With a drug level equal to or in excess of the concentrations for the drugs set out in the table below, or
 - While the employee's ability to safely perform his or her duties is adversely affected because of the use of a prescription or non-prescription drug;

Drug Concentrations in Urine		
Drug or class of drugs	Screening concentration equal to or in excess of ng/ml	Confirmation concentration equal to or in excess of ng/ml
Marijuana metabolites	50	15
Cocaine metabolites	300	150
Opiate metabolites	2,000	2,000
Phencyclidine	25	25
Amphetamines	1,000	500

- **From refusing to:**
 - Comply with a request to confirm he or she is in compliance with this policy when a supervisor or manager has reasonable grounds to believe the employee may not be in compliance, or
 - Comply with a request to submit to an alcohol or drug test:

- When a supervisor or manager has reasonable grounds to believe the employee may not be in compliance with the policy and the employee cannot confirm compliance without a test;
 - Following an incident or near miss if a supervisor or manager present at the workplace has reasonable grounds to believe that the employee was involved in the incident or near miss and there is no objective evidence to believe that the use of alcohol or drugs did not contribute to the cause of the incident or near miss;
 - When applying for or transferring into a safety-sensitive position;
 - As periodically required by the Company throughout the time the employee is working in a safety-sensitive position; and
 - When the employee has previously tested positive and is returning to work after an assessment by a substance abuse expert;
- **From tampering with a sample for an alcohol or drug test ; and**
 - **From operating or driving any company or personal vehicle or chauffeuring any customer, guest or employee while under the influence of alcohol , drugs or any controlled substance that would inhibit impaired driving conditions.**

This work rule permits the possession or use of prescription and non-prescription drugs under the following conditions:

- Any prescription drug in the employee's possession or used by the employee is prescribed to the employee, and
- The employee is using the prescription or non-prescription drug for its intended purpose and in the manner directed by the employee's physician or pharmacist or the manufacturer of the drug, and
- The use of the prescription or non-prescription drug does not adversely affect the employee's ability to safely perform his or her duties, and
- The employee has notified his or her supervisor or manager before starting work of any potentially unsafe side effects associated with the use of the prescription or non-prescription drug.

No information collected about an employee under this policy will be disclosed to any person, unless the employee has given consent or the supervisor or manager in possession of the information is legally required to disclose it.

Company-hosted Events

From time to time, our Company may host events within our offices or facilities, or other locations, at which alcoholic beverages may be available. During these events, the Company will:

- Monitor alcohol consumption;
- Discourage over-consumption (e.g. issue drink tickets, offer unlimited complimentary non-alcoholic beverages, serve food);

- Offer alternative transportation to guests as they leave the event (e.g. taxi chits); and
- Take reasonable measures when departing guests, who appear to be impaired, attempt to drive.

Guests to any of these functions must:

- Limit personal consumption to reasonable amounts so that alcohol does not impair their ability to behave in a responsible manner;
- Continue to meet the requirements of the Work Rules established in this policy if they must return to work following the event; and
- Abstain from alcohol consumption if they are on scheduled call or otherwise considered to be at work.

Resources

- Enform, Alcohol and Drugs Programs.
- Alcohol and Drug Policy Implementation Checklist.
- Alcohol and Drug Testing Guideline.