

5.5 - SUBSTANCE ABUSE POLICY

Effective: October 17, 2018

DRUG AND ALCOHOL POLICY

Policy Statement

Canadian Road Builders Inc. is committed to the health and safety of its employees, members, and the public at large. Canadian Road Builders Inc. recognizes and accepts the responsibility to provide its employees with a safe, healthy, and productive work environment. Recognizing the potential negative effects of alcohol and drugs on the organization, in particular, the hazards that individuals who abuse alcohol and/or drugs pose to themselves, their co-workers, and the general public, the company has implemented a drug and alcohol policy.

Purpose

The purpose of this Policy is to establish Canadian Road Builders Inc.'s expectations for appropriate behaviour, the consequences for non-compliance, to provide consistent guidelines for all employees, and to provide a means for supporting employees who are dealing with current or emerging drug and alcohol problems.

Violation of this policy is grounds for disciplinary action, up to and including termination. *All employees are required to read, sign and comply with all parts of this policy as a condition of employment.* All employees should be aware that this policy and the procedures it contains, in no way constitute a contract or contractual agreement of any kind whatsoever.

This Policy applies in whole or in part to contractors while providing services to Canadian Road Builders Inc. Any contravention will be considered a breach of their contract.

All employees will be subject to additional requirements which are site-specific, as required for any circumstances or conditions outlined by our Customer's Policy Contractor Requirements.

Definitions

- 1.1 "Drugs" means any substance, inclusive of illicit drugs, restricted drugs, and medication, as defined by this Policy, the use of which has the potential to cause impairment or intoxication, changing or affecting the way a person thinks, feels, or acts. For the purposes of this Policy, drugs of concern are those that inhibit a worker's ability to perform his or her job safely and productively.
 - (a) "Illicit Drug" means any drug or substance that is not legally obtainable and whose use, sale, possession, purchase or transfer is prohibited by law (for example, street drugs such as heroin and cocaine).

- (b) “Restricted Drug” - means any drug or substance capable of causing intoxication or impairment which is legally obtainable for recreational use and whose sale, purchase, possession, or transfer are restricted by law (such as cannabis).
 - (c) “Medication” refers to a drug obtained legally by an employee and used as indicated or directed, including but not limited to those obtained by the employee with a doctor’s prescription or medical document, as contemplated by the *Access to Cannabis for Medical Purposes Regulation* (as amended, repealed and replaced from time to time), and non-prescription or over-the-counter products.
- 1.2 “Under the influence” of Drugs, alcohol, intoxicants or any controlled or uncontrolled substance for the purpose of this Policy is defined as the use of one or more of these substances to an extent that an employee is:
- (a) Unable to perform in a productive manner;
 - (b) In a physical or mental condition that creates a risk to the safety and well-being of the individual, other employees, or the property of Canadian Road Builders Inc. or any member of the public; or
 - (c) Displaying signs or symptoms of impairing substance use, including but not limited to the smell of alcohol or drugs, slurred speech, and/or atypical behaviour.
- 1.3 “Drug or alcohol dependence”: A mental, physical, or psychological dependence on Drugs, alcohol, or other impairing substance that is considered by a physician to be a medical condition/disability as contemplated by Human Rights law.
- 1.4 “Recreational Drug/alcohol or other substance use”: With recreational use of Drugs, alcohol, or other impairing substances, there is no mental, physical or psychological dependence; therefore, this is not considered a medical condition or mental, physical, or psychological disability as contemplated by Human Rights law.
- 1.5 “Safety sensitive positions” shall include any position where the performance of duties with impaired physical or mental abilities creates a reasonably foreseeable risk of injury, physical harm, or danger, including, but not limited to employees who are required or permitted to operate their own personal vehicles for employment-related purposes. Safety-sensitive positions include: flag people; equipment operators; asphalt plant personnel; employees operating or having control of company vehicles; employees working in close proximity to machinery; employees performing maintenance on or repairing machinery; gravel pit and quarry personnel, workers alongside roads or railways and those that may require rescue such as confined space or working at height.

Treatment and Accommodation

2.1 Any employee suffering from a Drug or alcohol dependence is required to disclose the dependence to the employee’s immediate supervisor. This is a duty under the Internal Responsibility System (IRS) and specific clauses under the relevant Occupational Health & Safety Act or Regulations. Canadian Road Builders Inc. recognizes its responsibility to assist and accommodate employees suffering from a Drug or alcohol dependence to the extent reasonably possible, including providing access to sick

leave as with any other illness, without suffering undue hardship. Canadian Road Builders Inc. will take reasonable precautions to protect the employee's confidentiality given the sensitive nature of the issue.

2.2 Employees who are concerned that a fellow employee may be suffering from a Drug or alcohol dependence are strongly encouraged to report their concerns to the employee's immediate supervisor. While Canadian Road Builders Inc. will make its best efforts to protect employees' confidentiality when a concern is reported, it may be necessary for Canadian Road Builders Inc. to disclose certain information, including but not limited to the identity of the reporting employee, to the employee in question in order to properly investigate concerns.

Prohibitions

3.1 During an employee's working hours, whether on Canadian Road Builders Inc.'s premises or while conducting employment-related activities off Canadian Road Builders Inc.'s premises, including during meal periods, scheduled breaks, and on-call shifts, no employee shall:

- (a) Use, consume, possess, distribute, sell or be under the influence of Illicit Drugs;
- (b) Use, consume, possess, distribute, sell or be under the influence of Restricted Drugs;
- (c) Use, consume, possess, distribute, sell or be under the influence of alcohol, unless authorized by Canadian Road Builders Inc. for a specific limited purpose; or
- (d) Use, consume, possess, distribute, sell or be under the influence of any other intoxicants, whether a controlled or uncontrolled substance.

3.2 An employee shall not, under any circumstances, consume alcohol or use, consume, ingest, or inhale Illicit Drugs, Restricted Drugs or other intoxicants while in care and control of or responsible for any Canadian Road Builders Inc. vehicle or equipment, or while using the employee's vehicle for work-related purposes.

3.3 If an employee is called back after regular working hours to perform work-related duties and has been consuming alcohol or using Drugs or other intoxicants, it is the employee's responsibility to:

- (a) Ensure that he or she does not perform any employment duties, including operate a motor vehicle, while under the influence of alcohol, Illicit Drugs, Restricted Drugs, Medication or any other intoxicant or substance, if impairment has resulted;
- (b) Notify the employee's supervisor of the circumstances immediately; and
- (c) Confirm directly or through the employee's supervisor that a responsible employee who is not under the influence of alcohol, Drugs, or intoxicants will perform the required task.

3.4 The use of Medication in compliance with physician directions is permitted at work only if it does not impair the employee's ability to perform his or her work effectively and in a safe manner. Employees are required to disclose to their immediate supervisor the use of Medication that may affect their work performance or the safe execution of their duties. Canadian Road Builders Inc. is committed to accommodating an employee's necessary use of Medication to the extent reasonably possible without suffering undue hardship.

3.5 Employees are advised to make their physicians or pharmacists aware of their safety-sensitive occupation and request information regarding effects and side effects of medications. Any medication or medical information reported will be treated as confidential. Employees taking medication that may cause impairment are prohibited from performing safety-sensitive job functions.

3.6 All employees of Canadian Road Builders Inc. are expected to perform to the standards set forth in their respective job descriptions. Declines in work performance due to substance abuse will be addressed initially in the same manner as performance deterioration for other reasons.

3.7 Off-duty use of any mood or mind-altering substances or medications, which could adversely affect an employee's job performance, or which could jeopardize the safety of other employees, our customers, the general public or our company property is proper cause for administrative or disciplinary action, up to and including termination of employment, with cause and without notice.

3.8 On or off-duty employees who are arrested for drug or alcohol related offences may be considered in violation of this policy. The employee must report all such criminal charges to their immediate supervisor. In deciding what action to take, management will take into consideration the nature of the charges, the employee's present duties, the employee's work records and other related factors as it is deemed appropriate. The employee may be referred to the company's EAP program for a substance abuse assessment and must consent to release outcome and recommendations to the company. The employee may be required to agree to a conditional work agreement. The employee may be subject to disciplinary action, up to and including termination.

3.9 Employees convicted or impaired driving (impaired by any type of drug or alcohol), whether in a personal or company vehicle, may be subject to disciplinary action up to and including dismissal, and/or completion of a drug and alcohol assessment as a condition of continued employment.

3.10 Canadian Road Builders Inc. reserves the right to investigate any situation where there is reason to believe that a specific employee or group of employees may be in possession of drugs or alcohol. Employees may be required to submit to searches of their clothing, lockers, company vehicles, desks, tool boxes, lunch boxes, briefcases or other containers brought onto company property. The supervisor or company official who may make a determination for a search shall be trained in administering alcohol and drug programs in the workplace.

Testing

4.1 Post-Incident Testing

Canadian Road Builder Inc. employees may be subject to post-incident testing following an incident investigation. Every attempt will be made to have the alcohol test completed within 8 hours and the drug test completed within 32 hours.

All employees shall be subject to post-incident testing if:

- (a) Employee is involved in an incident resulting in a fatality, or

- (b) Any lost time injury
- (c) Any serious incident or potentially serious incident
- (d) Any motor vehicle incident involving damage to any vehicle, equipment or property, or where “reasonable grounds” exists
- (e) A spill or abnormal discharge of gas, liquid or solid causing long term health effects, public evacuation or serious environmental discharge.
- (f) Any circumstance or conditions dictated by customer policy
- (g) Other incidents may be subject to post-incident testing following an incident investigation.

As soon as possible following an incident as defined in this policy, the employee shall make every attempt to contact his/her supervisor or company official. The employee must remain available for testing, or the company may consider the employee to have refused to submit to testing. The supervisor will provide to the employee the reason for the request to test. Employees involved in an incident must refrain from consuming alcohol for eight hours following the accident or until tested.

A supervisor or manager need not request the employee to submit to an alcohol and drug test if the supervisor or manager and the next level of management present at the company workplace, if any, conclude that there is objective evidence to believe that the use of alcohol and drugs did not contribute to the cause of the incident or near miss.

4.2 Reasonable Cause Testing

Canadian Road Builders Inc. reserves the right to conduct testing for the presence of alcohol, or Drugs when it has reasonable cause to believe that the actions, appearance or conduct of an employee while on duty (including while on-call) is indicative of the use of Drugs or alcohol. While Canadian Road Builders Inc. reserves this right for all of its employees, employees should understand that the necessary threshold to establish reasonable cause in the eyes of Canadian Road Builders Inc. will be lower for employees in safety-sensitive positions given the potential consequences involved.

The basis for the decision to test will be documented as soon as possible after the action has taken place. The referral for the test will be based on specific, personal observations resulting from, but not limited to:

- (a) Observed use or evidence of use of Drugs or alcohol (e.g. smell of alcohol or cannabis);
- (b) Erratic or atypical behaviour of the employee;
- (c) Changes in physical appearance of the employee;
- (d) Changes in behaviour of the employee;
- (e) Changes in speech patterns of the employee;
- (f) Discovery of Drugs, inclusive of Medication capable of causing impairment, alcohol, intoxicants or related paraphernalia found in locations to which an employee has sole or primary access, including employees’ lockers or assigned vehicles; or
- (g) Following a serious incident or accident where the possibility of Drug or alcohol impairment cannot be easily ruled out from review of the circumstances, including a “significant incident” as defined by Occupational Health & Safety legislation, and a situation which created significant potential or risk for an incident or accident, even if an incident or accident did not ultimately result (a “near miss”).

In addition, Canadian Road Builders Inc. may conduct reasonable cause testing upon receipt of a complaint or concern by a co-worker or third party that an employee may be using Drugs, alcohol or other substances contrary to this Policy. In such circumstances, Canadian Road Builders Inc. shall record the name and contact information of the complainant as well as the details of the concern or complaint. The Canadian Road Builders Inc. shall provide the details of the concern or complaint to the accused employee and, in appropriate circumstances, shall also provide the complainant's identity to the accused employee to allow him/her the opportunity to provide a full and complete response to the allegations.

Where reasonably possible, such tests shall be conducted respectfully and in a manner to minimize the intrusive nature of the tests and protect the employee's privacy. In all situations where Canadian Road Builders Inc. believes an employee is unfit to be at the workplace, a responsible escort will be used to escort the employee home.

The supervisor or company official who may make a reasonable suspicion determination shall be trained administering alcohol and drug programs in the workplace and will provide to the employee the reason for the request to test. Any employee undergoing a reasonable suspicion test shall be placed on administrative leave without pay pending the outcome of test results.

4.5 Return to Work Testing

When an employee returns to work following a disclosure that the employee suffers from a drug/alcohol dependency and subsequent treatment, Canadian Road Builders Inc. may require the employee to undergo a return to work test. Further random, unannounced return to work testing may be required for up to twenty-four (24) months after the employee returns to work.

Employees who are returning to duty following a positive test situation shall undergo a return to duty drug and/or alcohol test with the request that a negative test result be confirmed, failing which further discipline up to and including dismissal for just cause will take place.

Return to Duty and Follow-Up testing must be directly observed and must be conducted at a facility designated by Canadian Road Builders Inc.

4.6 Testing Procedures

Any testing undertaken pursuant to this Policy, including analysis of results, shall be performed by a qualified professional. Where appropriate, results shall be confirmed by laboratory testing, which shall be performed at an accredited laboratory.

Where reasonably possible, tests shall be conducted respectfully and in a manner to minimize the intrusive nature of the tests. The Supervisor/Manager or Director will contact the alcohol and drug testing provider to schedule a test. The process is to be completed as soon as possible after the incident or observation that is deemed within the guidelines of this Policy. The drug testing will be performed in compliance with the testing procedures as defined by the drug and/or alcohol testing facility. Positive test results shall be reviewed and verified by a physician to confirm if a Drug or alcohol dependency exists.

Canadian Road Builders Inc. will store test results in a secure location with access restricted to Canadian Road Builders Inc.'s Safety Department and Human resources employees with demonstrable need

for access to test results, in order to preserve employee privacy. Test results will not be disclosed to third parties without prior written consent of the employee, subject only to a legal requirement for Canadian Road Builders Inc.'s to produce employee test results.

4.7 Positive Test Results

Drug Tests: Employees will be tested for the following controlled substances: marijuana, cocaine, opiates, amphetamines, methamphetamines, MDMA (Ecstasy), and phencyclidine (PCP). Industry standard cut off levels, above which a test result is considered positive, have been established by the US Department of Human Health Services (DHHS) and the Canadian Model developed by the Construction Owners Association of Alberta (COAA). Employees with a confirmed positive drug test must be removed from duty and referred to a Substance Abuse Professional for evaluation. The presence of the below substances in amounts equal to or higher than "confirmation concentration" listed below shall constitute impairment for the purpose of this policy and shall result in the various systems and consequences as set out herein. Any substance not listed and that constitutes a substance that may reasonably detrimentally affect the employee's ability to perform his or her job in a safe manner shall be a "positive test" if testing demonstrates any concentration of such substance.

Drugs or Classes of Drugs	Screening cut off level equal to or in excess of ng/mL	Confirmation cut off level equal to or in excess of ng/mL
Amphetamines		
Amphetamine	500	250
Methamphetamine	500	250
MDMA		
Methylenedioxymethamphetamine	500	250
Methylenedioxyamphetamine	500	250
Cocaine metabolites	150	100
Marijuana/Cannabinoid metabolites	50	15
Cocaine	150	100
Opiates		
Codeine	2000	2000
Morphine	2000	2000
Heroin (6-AM)	10	10
Phencyclidine (PCP)	25	25

Oxycodone		
Oxycodone	100	100
Oxymorphone	100	100
Hydrocodone		
Hydrocodone	300	100
Hydromorphone	300	100

Alcohol Tests – Results of alcohol concentration of 004 (40 milligrams of alcohol per 100 millilitres of blood) or greater are considered a positive test for impairment and employees must be removed from duty and referred to a Substance Abuse Professional for evaluation.

Collection Procedures

5.1 Any drug/alcohol testing conducted under this policy shall be performed at a collection site designated by Canadian Road Builders Inc. for the purposes of administering this policy. The company will not accept test results from any facility other than the one designated by the company. Once a request is made, the employee must proceed immediately to the determined collection facility. Transportation and supervisor escort will be provided when required.

5.2 Collection procedures at all testing facilities shall conform to the most recent industry standards as noted in the COAA Canadian Model, Urine Specimen Collection Guidelines.

5.3 Testing procedures, including urine collection, saliva and breath alcohol testing, urine laboratory analysis and medical review procedures shall be conducted in accordance with applicable Canadian industry standards outlined in the COAA Canadian Model.

Refusal to Test

6.1 An employee's refusal either to:

- (a) comply with a request made by Canadian Road Builders Inc. to submit to alcohol and/or drug testing
- (b) provide a suitable sample for an alcohol and/or drug test, shall subject the employee to disciplinary action up to and including termination of employment with cause and without notice. In the event that the employee is not terminated, the Company shall refer such an employee to a Substance Abuse Professional.

6.2 Attempts to tamper with a sample are considered a refusal to test. Any conduct that clearly indicates an attempt to substitute or adulterate a specimen will result in a second collection under direct observation, in accordance with Urine Specimen Collection Guidelines (as noted in Section 5.3),

6.3 Failure to Provide a Sample: Individuals who cannot provide a urine sample initially may consume up to 40 ounces of appropriate fluids over a three hour period. After that time has elapsed, efforts to collect the sample shall cease and a “shy bladder” situation shall be declared. Individuals unable to provide either an adequate urine sample or breath sample shall be referred to a physician for evaluation. If the evaluation fails to identify an acceptable medical explanation for the inability to provide a specimen, the failure to provide a sample shall be considered as a “refusal to test”.

Discipline

7.1 Canadian Road Builders Inc. views the rules contained in this Policy to be of the utmost importance. This is a zero-tolerance policy; any deviation from the above terms will result in disciplinary action that may include immediate termination. All employees will be provided with a copy of this Policy as notification that any resulting dismissal will be considered as “dismissal for just cause” and not subject to notice or pay in lieu of notice.

7.2 As indicated above, any employee suffering from a Drug or alcohol dependence is required to disclose the addiction, and Canadian Road Builders Inc. recognizes its responsibility to assist and accommodate employees suffering from such a condition. However, if an employee neglects or refuses to disclose a Drug or alcohol dependence Canadian Road Builders Inc., will be forced to deal with breaches of this Policy. Based on the understanding that the employee is not suffering from a Drug or alcohol dependence, but has simply disregarded this Policy, immediate and strict disciplinary action will be taken. Further, failure to disclose a Drug or alcohol dependence is a violation of this Policy.

7.3 Before returning to safety-sensitive duties, any employee must undergo the following:

- (a) Complete an evaluation by a qualified Substance Abuse Professional (SAP);
- (b) Agree to complete any recommendations (including treatment) made by the SAP;
- (c) Pass a return-to-duty alcohol and/or drug test;
- (d) Agree to return-to-work conditions that include unannounced follow-up alcohol and/or drug testing over a period of twenty-four months;
- (e) All return-to-duty conditions will be at the employee’s expenses.

7.4 This is a condition of continued employment at Canadian Road Builders Inc. Should any test, during the twenty-four month period be confirmed positive for alcohol/drugs, and/or the employee does not comply with SAP recommendations, the employee may be subject to termination for just cause. Return to work provisions will include the signing of a return to work agreement specifying exact employment conditions.

7.5 When an employee’s job-related problems are known to be the result of a drug or alcohol abuse;

- (a) if remedial action has been considered and rejected, or
- (b) when the employee has either rejected assistance or demonstrates a lack of serious commitment to overcoming the problem, or
- (c) when the employee has failed to acknowledge or, advise Canadian Road Builders Inc. that he or she has a drug or alcohol problem,

Termination of employment may apply at the sole discretion of Canadian Road Builders Inc.

Post-Violation Return to Work

8.1 Seeking voluntary assistance for Drug or alcohol dependence will not jeopardize an employee's employment with Canadian Road Builders Inc., so long as the employee continues to co-operate and seek appropriate treatment for his or her disclosed problem and is able to treat and control the problem to facilitate a return to work within the reasonably foreseeable future.

8.2 Any employee violating this policy who is subsequently authorized and accepted by Colas Canada Inc. to return to the workplace shall receive a Return to Work Letter outlining conditions of the return to the workplace that will normally include, but is not limited to, the following:

- (a) Requirement to continue treatment, counselling and assistance programs or procedures recommended by the employee's advising physician or addiction counsellor;
- (b) Express obligation to immediately cease performance of duties and notify a supervisor in the event the employee finds themselves under the influence at any time during work hours following a return to the workplace;
- (c) Requirement to provide written medical confirmation that the employee has any condition under control and is able to safely return to the workplace without danger to the employee or others;
- (d) Requirement to provide reasonably regular updates from the employee's physician or addiction counsellor confirming that the employee continues to follow recommended treatment programs and continues to be fit for performance of duties without danger to themselves or others; and
- (e) An express warning to the employee that future violations of the Policy will lead to further discipline and serious consideration of immediate termination for just cause.

8.3 Employees suffering from Drug or alcohol dependence who fail to cooperate with assistance or treatment programs or engage in repeated infractions of this Policy, will be subject to the normal disciplinary sanctions, up to and including immediate termination for just cause.

Employee Assistance Program and Self-Help

9.1 Canadian Road Builders Inc. maintains an employee assistance referral program that provides help and information to employees who suffer from substance abuse and other personal or emotional problems. However, it is the responsibility of each employee to seek assistance before performance problems lead to disciplinary action. Failure to do so will attract the other policies and strict consequences as outlined herein. For greater certainty, in the event that an employee fails to self-report and seek assistance, that employee shall face disciplinary action for breaching this policy up to and including termination with cause and without notice. Once a violation of the Drug and Alcohol Policy occurs, subsequent employee use of the referral program on a voluntary basis will not lessen disciplinary action.

9.2 This policy encourages employees who feel they may have a substance abuse problem and would like to take advantage of this program to contact the Designated Employer Representative or the

Human Resources department. All communication is confidential. Voluntary disclosure of an alcohol or drug problem will not in and of itself result in discipline.

9.3 An employee who believes that he or she may be unable to comply with this Drug and Alcohol Policy must seek help by taking such steps as are necessary to ensure that he or she presents no safety risk to himself or herself or others at the workplace. Seeking voluntary assistance for drug or alcohol problems will not jeopardize an employee's employment with the employer, so long as the employee continues to co-operate and seek appropriate treatment for their disclosed problem and is able to treat and control the problem to facilitate a return to work within the reasonably foreseeable future. Employees suffering from a drug or alcohol addiction who fail to co-operate with the assistance or treatment programs and/or engage in infractions of this policy will be subject to the normal disciplinary sanctions, including immediate termination for just cause.

Employee Responsibilities

10.1 All employees are required to read, sign and comply with all parts of this policy. Understanding, accepting and complying with the "Drug and Alcohol Policy" is a condition of employment with Canadian Road Builders Inc.

10.2 All employees are required to arrive and remain fit for work during their assigned duties free from all effects of drug and alcohol,

10.3 Employees shall consult with their doctor and/or pharmacist regarding the proper use of prescribed medications and any negative impact they may have on their performance or safety. Employees shall use medication responsibly and report any potentially harmful prescription they may be taking to their Supervisor.

10.4 All employees shall seek support if they feel that they have or may be acquiring a drug or alcohol dependency, participate in the company's employee assistance program and follow all recommendations of the program.

10.5 All employees shall encourage their peers or co-workers to seek help when there is a potential breach or breach of policy.

10.6 All employees shall cooperate with any work modification related to safety concerns as a result of a current or emerging problem.

Because all individuals working for CANADIAN ROAD BUILDERS INC. have a shared responsibility for workplace safety, employees are encouraged to look out for other employees, contractors or visitors in terms of fitness for duty and safety. Employees who are concerned that a fellow employee may be suffering from a drug or alcohol problem are strongly encouraged to report their concerns to their supervisor.

Supervisor Responsibilities

11.1 Supervisors shall communicate and give leadership in the administration of this policy

11.2 Supervisors shall be trained in administering drug and alcohol programs in the workplace and in recognizing signs and symptoms of impairment. Supervisors shall also be trained in intervention techniques with employees who are suspected of being at work under the influence of alcohol and/or drugs.

11.3 Supervisors shall be responsible for ensuring employees submit to substance abuse testing as required, in a timely manner as outlined in this policy.

11.4 Supervisors shall be responsible for addressing prescriptions medications their employees are taking and working with the company's safety department to make sure the prescription will not affect their ability to work safely.

11.5 Supervisors will understand the Alcohol and Drug Policy is integral to safe operations and will take action on performance deviations.

11.6 Supervisors shall take action on reported or suspected alcohol or drug use by employees.

11.7 Supervisors will be responsible for guiding employees who seek assistance to appropriate resources (for example, the employee assistance program or other community services).

11.8 Supervisors shall be knowledgeable about return to work situations and the management of relapse situations.

Employer Responsibilities

12.1 Employer shall provide a safe workplace.

12.2 Employer shall provide prevention programs that emphasize awareness, education and training as the principal methods of ensuring commitment to and compliance with this Drug and Alcohol Policy.

12.3 Employer shall ensure managers and supervisors are aware of client requirements with respect to substance abuse and impairment in the workplace.

12.4 Employer shall ensure proper investigation and inquiry procedures are followed when interviewing employees and investigating incidents pursuant to the policy requirements.