

## Policy governing the use of drugs and alcohol

### Purpose

Because it is committed to ensure the health and safety of its personnel, Congebec has designed and implemented a Policy aimed at defining expectations and providing directions when it comes to the use of drugs and alcohol.

### Definitions

**Drug:** Any substance (including medication, medicinal cannabis (regardless of form), cocaine, opioids, and amphetamines) likely to influence or impair the way in which an individual thinks and/or acts. The definition excludes any and all medication which has been disclosed to Congebec as part of a specific intervention plan.

**Drug paraphernalia:** Any material or equipment that may be used to inject, ingest, inhale, or otherwise introduce any kind of illegal drug or controlled substance into a human body.

**Medication:** Any medication obtained lawfully, whether over-the-counter or through prescription. For the sake of clarity, it is specified that the only medication covered under this Policy are those likely to prevent a worker from performing their tasks in a safe and productive manner.

**Alcohol:** Any and all drinks which contain some measure of alcohol (such as beer, wine, and distilled spirits).

### Directions

Any Employee who works while their faculties are impaired by drugs or alcohol may seriously compromise their own safety and the safety of their fellow co-workers. In accordance with laws and regulations pertaining to occupational health and safety and in order to promote a safe and secure working environment, it is strictly forbidden to show up for work or to carry out any task while one's faculties are impaired by drugs or alcohol. Such a prohibition also applies to social events organized by Congebec (whether or not they are held on company property), to travelling activities, as well as to gatherings set up by third parties and to which an employee participates on behalf of Congebec.

In the same vein, it is, at all times, strictly forbidden to use, purchase, or sell any kind of drugs or alcohol on company property. Subject to applicable laws and regulations and unless Management has directed otherwise, it is also strictly forbidden to use or serve drugs or alcoholic beverages on company property.

### Expectations

The requirements listed below must be met by any and all Congebec employees (including members of Management) who perform their duties on or outside company property:

- Employees must show up for work in a condition which allows for the safe and up-to-code performance of their duties. They must not, at any time or in any circumstances whatsoever, be under the influence of drugs or alcohol.
- Employees must remain in that condition throughout their entire work day or shift.
- It is strictly forbidden to use, possess, sell, or distribute drugs or alcoholic beverages during working hours and scheduled breaks.

- No employee may ever show up for work while their faculties are impaired by alcohol, recreational cannabis, or any medication which has not been validly prescribed.
- Employees who use medication must disclose to Management any and all potential risks, limitations, or restrictions likely to require a modification of their tasks or a temporary reassignment.
- Employees must, at all times, abide by the laws and regulations pertaining to the use and possession of cannabis.

### **Duties and responsibilities**

Congebec shall:

- Clearly disclose its expectations when it comes to the use of drugs and alcohol;
- Design, maintain, and promote an employee health program;
- Provide a safe and healthy workplace to its personnel;
- Review and update this Policy at regular intervals.

Management shall:

- Identify all situations where one might suspect that an employee's capacity to perform their tasks safely is compromised;
- Make sure that any employee who requests assistance with an addiction to drugs or alcohol benefits from adequate support;
- Ensure the privacy and confidentiality of all information exchanged in that context.

All employees shall:

- Abide by the provisions of this Policy and remain aware of their obligations and responsibilities in that respect;
- Show up for work with acute faculties and remain in that condition throughout their entire work day or shift, including for driving company owned motor vehicles.
- Report any fellow employee who does not seem fit to occupy a Management position;
- Carry out their tasks in a secure manner and in compliance with the safe work practices implemented by the company;
- Refrain from using, possessing, selling, or distributing drugs or alcoholic beverages on company property, at any given time during their work day or shift;
- Should the company ask them to work during a scheduled holiday, decline whenever they feel that they cannot do it safely on account of having consumed drugs or alcohol;
- Report any and all limitations, restrictions, or required changes brought about by the use of medication;
- If need be, request advice and/or treatment;
- Disclose any actual or impending addiction to drugs or alcohol.

### **Suspected impairment**

Should the impairment of an employee's faculties ever be suspected, the following procedure will be followed:

1. If at all possible, the employee's supervisor must request a second opinion from a manager or another supervisor.
2. The supervisor must then meet privately with the employee in order to discuss the cause of the symptoms they have observed and determine whether or not drugs or alcohol are in issue. Suspicions of impairment of an employee's capacity to perform their tasks in a safe manner may be based upon personal observations.

- Should the employee display some unusual behaviour (such as, without limitation, slurred speech, unsteady balance, red or teary eyes, dilated pupils, or a smell of alcohol on their breath), they must not be allowed to resume their tasks. The safety of other workers and of visitors must always remain a priority.
3. The decision that an employee is « unfit for work » on account of impaired faculties shall be taken by two (2) members of Management acting upon their best judgment. The administration of a blood test or of a breathalyzer test shall NEVER be mandatory. Depending on the seriousness of the symptoms observed, the employee will either be driven to their home or transported to a medical facility. If need be, they may be accompanied by a superior or a fellow co-worker.
  4. No employee who displays signs of impairment shall ever be allowed to drive. In fact, they must be clearly informed that should they refuse to be driven by Congebec and insist on using their own motor vehicle, the company will report the situation to the police.
  5. A meeting shall be held between the employee's supervisor and a Human Resources representative in order to review the incident and devise an intervention plan which might include (as the case may be) medical support, a temporary reassignment, and even disciplinary actions.

### **Possession in the workplace**

It is strictly forbidden to keep alcoholic beverages, drugs, or drug paraphernalia on company property. For the purpose of this Policy, « company property » includes any and all locations owned or rented by Congebec where employees may be asked to work (such as, without limitation, parking lots, motor vehicles, closets, and lockers).

Such a prohibition also applies to meetings and gatherings held outside of company property, in which employees participate on behalf of Congebec.

### **Addiction to drugs and/or alcohol**

Although Congebec is well aware that some individuals may develop an addiction to drugs or alcohol which, over time, can become an actual disease or handicap, no employee will ever be released from their duties simply because they have developed an addiction. Instead, reasonable accommodations will have to be discussed, designed, and implemented so the employee can keep working safely.

As reasonable accommodations prove the most effective when addictions are disclosed early on, any employee who believes that they are developing an addiction to drugs or alcohol should promptly notify their supervisor or the Human Resources department accordingly. From there, the company shall work with the employee in order to devise and implement mutually beneficial measures.

### **Wilful disclosure**

In any event, employees who wish to be properly accommodated are encouraged to disclose any and all past and present addictions. No member of personnel shall ever be penalized simply because they require assistance or have gone through rehab in the past.

Unless it must be disclosed under the law or to group insurance providers, all the information collected in the course of a disclosure will be kept strictly confidential.

### **Medicinal cannabis**

Any employee who absolutely must use medicinal cannabis on company property must (i) provide a copy of all medical records confirming such mandatory use, and (ii) comply with

all the accommodation measures agreed upon as well as with the rules and standards dealing with occupational health and safety.

**Return to the workplace / Agreement as to the resumption of work**

Congebec may, at any time and in accordance with an employee's commitment to stop using drugs or alcohol, insist on the preparation and execution of an agreement as to resumption of work that will define the terms and conditions under which the employee is allowed to go back to work as well as the consequences of violating such terms and conditions.

Any given agreement as to resumption of work may include mandatory drugs and alcohol screening tests.

**Disciplinary actions**

Any employee who fails to comply with the provisions of this Policy and/or with accommodation measures agreed upon with Congebec may be subject to disciplinary actions up to (and including) dismissal.

**Acknowledgement and consent**

I understand that in my role at Congebec, I use heavy equipment or handle substances involving risks.

By entering my signature below, I acknowledge having thoroughly read and understood Congebec's « Policy governing the use of drugs and alcohol ». I hereby represent and warrant that I will abide by the provisions of said Policy and will make sure that each and every worker I employ complies with them also. I understand and accept that in the event where I violated any of the provisions of this Policy, I may be subject to disciplinary actions up to (and including) dismissal.

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Complete name (in block letters)

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Title of position held at Congebec

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Signature

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Date