

	<b>WESTERN MILLCRAFT INC.</b> 12506 – 128 STREET EDMONTON, AB, T5L 1C8	Effective Date: 1 OCTOBER, 2011	Revised by: JFK
	<b>OCCUPATIONAL HEALTH &amp; SAFETY MANUAL</b> <b>COMPANY RULES AND REGULATIONS</b> <b>DRUG AND ALCOHOL PROCEDURE</b>	Page 1 of 4	HSE: 5.21: 14.3.6 Revision: 00

**DRUG AND ALCOHOL PROCEDURE:**

Western Millcraft Inc. is committed to providing and maintaining a safe and healthy work environment for all its employees, contractors, sub-contractors, customers and the public. A healthy and productive work force, safe working conditions free from the effect of drugs and alcohol, and maintenance of the quality of products and services are not only important to Western Millcraft Inc., but to all employees as well. All workers are responsible to actively participate in maintaining a drug and alcohol free work site, and Western Millcraft Inc. recognizes drug and alcohol abuse as a health, safety, and wellness concern.

The abuse of drugs and/or alcohol creates a variety of worksite hazards, including but not limited to decreased productivity, decline in the quality of products and services, and an increased risk of injury.

**COST OF ALCOHOL AND DRUG RELATED PROBLEMS:**

- Increased risk of injury to self
- Increased risk of injury to others
- Increased incidents of illness
- Absenteeism
- Negative impact on employee morale
- Lost productivity
- Legal liability for the actions of impaired employees

**RULES AND REGULATIONS:**

All employees who are contacted to report for unscheduled work shifts must not accept the work assignment if they have reason to believe their ability to perform their job safely is impaired by drugs and/or alcohol. Any employee refusing a work assignment on this basis will not be subject to discipline.

Western Millcraft Inc. will not allow any employee, contractor, or sub-contractor to be under the influence of, consuming, selling, purchasing, transferring, offering, possession of, or use of any alcoholic beverage, any illegal or illicit narcotic drug, or the abuse of either a prescription or non-prescription drug, during working hours on premises or job sites, including lunch and coffee breaks, is strictly forbidden by Western Millcraft Inc.

Any observation of impaired motor skills or judgment, unusual behavior or reliable information will be considered reasonable cause to stop any employee, contractor, or sub-contractor from working, and result in a search of bags, packages, or other personal effects. If the individual refuses to consent to such a search, that individual will be escorted from Western Millcraft Inc. facilities or work site.

Western Millcraft Inc. Management will remove the effected or compromised employee, contractor, or sub-contractor from the work site, evaluate their condition, and discuss the situation with them in private. Whenever possible, two members of Management will evaluate the employee, contractor, or sub-contractor. Further to the evaluation, if the employee, contractor, or sub-contractor is found unfit for work by reason of impairment by drugs and/or alcohol, this shall be noted and 'Reasonable Cause' and testing arrangements will be made.

**TESTING FOR DRUGS AND ALCOHOL:**

Western Millcraft Inc. reserves the right to conduct the following types of drug and alcohol tests as part of the Drug and Alcohol Program:



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<b>DRUGS OR CLASSES OF DRUGS</b>	<b>SCREENING CONCENTRATION EQUAL TO OR IN EXCESS OF ng/ml</b>	<b>CONFIRMATION CONCENTRATION EQUAL TO OR IN EXCESS OF ng/ml</b>
MARIJUANA	50	15
COCAINE METABOLITES	300	150
OPIATE METABOLITES	2000	2000
PHENCYCLIDINE	25	25
AMPHETAMINES	1000	500

**IMPLEMENTATION OF THE ALCOHOL AND DRUG WORK RULE:**

**EDUCATION:**

Western Millcraft Inc. is committed to informing employees, contractors, and sub-contractors of the existence of this alcohol and drug program and taking other steps as are reasonable to inform them of the safety risks associated with the use of alcohol and drugs and the assistance available.

**DRUG AND ALCOHOL TESTING:**

Western Millcraft Inc. agrees to retain **SureHire Pre-Employment Screening & Occupational Testing** to conduct urine drug testing and alcohol testing under this program.

All Western Millcraft Inc. employees, contractors, or sub-contractors accept the terms of this drug and alcohol policy and authorizes the laboratory to provide the test results to Western Millcraft Inc. or any person with legal authority to disclose the test results. Further, the employees, contractors, or sub-contractors authorizes the medical review officer to provide the test results to a substance abuse expert to whom the employees, contractors, or sub-contractors has been referred under the provisions of this policy.

Drug and alcohol test results can be negative, positive, tampered and invalid or inconclusive. A negative test result means the employee, contractor or sub-contractor is in compliance, a positive test result means non-compliance, a tampered test result means non-compliance, and an invalid or inconclusive test result cannot be relied upon to determine compliance or non-compliance. All test results will be provided in a confidential written report from the medical review officer to Western Millcraft Inc. designated company representative. In order to preserve the confidentiality of test results, Western Millcraft Inc. designated company representative and any person to whom disclosure is permitted under this alcohol and drug policy must not disclose the test results to any person other than a person who needs to know the test results to discharge an obligation under this alcohol and drug policy.

**CONSEQUENCES FOR FAILURE TO COMPLY WITH THE DRUG AND ALCOHOL WORK RULE:**

Western Millcraft Inc. may discipline, or terminate for cause, the employment of an employee who fails to comply with the drug and alcohol work policy. The appropriate consequence depends on the facts of the case, including the nature of violation, the existence of prior violations, the response to prior corrective programs, and the seriousness of the violation(s).

Prior to Western Millcraft Inc. making a final decision with regard to disciplining or terminating the employment of an employee, who has failed to comply with the drug and alcohol work policy, Western Millcraft Inc. shall direct the employee to and the employee shall meet with a substance abuse expert. The substance abuse expert shall make an initial assessment of the employee and make appropriate recommendations. The assessment by the substance abuse expert shall be applied utilizing the processes and approaches set out in Appendix B. The employee shall, through the substance abuse expert, provide to the company a confidential report of his or her initial assessment and recommendations. Western Millcraft Inc. shall then make the final decision. The initial

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assessment is to be completed as soon as possible, and the report shall be delivered to Western Millcraft Inc. within two days of completion. Failure by the employee to attend the assessment or follow the course of corrective or rehabilitation action shall be cause for termination of the employee. During the period of assessment and corrective rehabilitative programs recommended by the substance abuse expert the employee shall be deemed to be suspended from his or her employment without pay.

In addition to disciplining or terminating for cause the employment of an employee who fails to comply with the drug and alcohol work rule, Western Millcraft Inc. may give written notice to that employee that they will not be re-employed again by Western Millcraft Inc. unless the employee provides Western Millcraft Inc. with the following:

- A certificate issued by the rehabilitation program service provider certifying that the employee who was terminated has successfully completed its rehabilitation program and continues to comply with all the requirements of the rehabilitation program
- A certificate issued by a licensed physician with knowledge of substance abuse disorders certifying that the employee who was terminated is able to safely perform the duties he/she will be required to perform if employed by Western Millcraft Inc.
- A statement signed by the employee acknowledging that the employee agrees to any conditions imposed as part of a corrective rehabilitative program and such other reasonable conditions set by t Western Millcraft Inc. Western Millcraft Inc. may terminate the employment of the employee who fails to comply with the conditions set out in such statement.

**OWNERS RESPONSIBILITY TO VIOLATIONS:**

The owner of a site where a person was working when he/she failed to comply with the drug and alcohol work rule may give the person who failed to comply with the drug and alcohol work rule written notice that he/she shall not enter the owner's site.

The owner of a site where a person was working when he/she failed to comply with the drug and alcohol work rule may give that person who has been denied permission to enter its site written notice that the person may enter the owner's site if:

- A company engaged in work at the owner's site and provides the owner with a written statement by the person who has been denied permission to enter the owner's work site acknowledging that that person agrees to reasonable conditions imposed by the owner or the contractor or a part of a corrective or rehabilitative program.
- The owner may withdraw permission given if the person given permission to enter the owner's work site fails to comply with the drug and alcohol work rule or any condition imposed
- The owner is not obliged to give a person who has been denied permission to enter the owner's site another opportunity to work on the owner's site.

If work performance is affected by drug and/or alcohol dependency, participation and completion of a rehabilitation program may be required as a condition if ongoing employment with Western Millcraft Inc. Determination of the individual's circumstances with regards to participation in a rehab program and continued employment will be jointly decided by management and the employee. An employee's decision to voluntarily seek assistance to treat drug or alcohol dependency will not alone be used as a basis for disciplinary action.

All employees will be made to understand that Western Millcraft Inc. will not allow them to continue working in any capacity until they seek treatment to eliminate their dependence or practice of substance abuse.

Rehabilitation - Any employee who has returned to work following a suspension due to the positive test. As a condition of continuous employment such workers must submit to drug and alcohol testing at the request of Western Millcraft Inc. for up to 24 months from the date of their return to work.

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**EMPLOYEE AND FAMILY ASSISTANCE PROGRAM:**

As a part of the overall concern for the health and well-being of our employees Western Millcraft Inc. will provide, upon request, to any employee information on the medical, financial, or emotional toll that substance abuse may be having on the employees, his/her family or associates.

Western Millcraft Inc. maintains an Employee and Family Assistance Program (EFAP) to direct employee to agencies that will be available to provide assessment, diagnosis, or treatment as required. Absolute confidentiality will be preserved to respect the dignity and privacy of the individual. An employee’s decision to seek advice through the EFAP will not result in disciplinary action.

The Information in this policy does not take precedence over the OH&S Act, Regulation, Codes, or applicable Government Legislation