



## POLICY PHILOSOPHY

SemCAMS (“SemCAMS” or “Company”) is committed to the safety and well-being of employees and their families, business partners and the communities in which it operates. SemCAMS recognizes that the use of illegal or illicit drugs, the inappropriate use of alcohol and the misuse of medications and other substances may have serious adverse effects on employees’ health, safety and job performance and may have a serious negative impact on other employees, customers or the community. Therefore appropriate measures are necessary to ensure the safe and successful conduct of our Company business.

The Company recognizes that most individuals will use alcohol and medications in a responsible manner. We also recognize that alcohol or drug dependency is a treatable condition and that awareness, education, early detection and treatment for those that need it are all necessary to maintain a safe and healthy workplace.

## SCOPE

This policy applies to all employees of SemCAMS and all contract workers working for SemCAMS in all circumstances where Company business is being conducted whether on or off Company premises. For the purposes of this policy, drugs of concern include illegal and illicit drugs, alcohol and medications which inhibit or may inhibit an employee’s ability to perform their job safely and productively.

SemCAMS will also take reasonable steps to ensure that companies contracting to SemCAMS enforce the fitness for duty provisions with respect to alcohol and drug use or possession, as set out in this policy for their employees, sub-contract workers/agents. Contracting companies will be made aware of these requirements when bidding for a contract, and at the time any contract for services is reached. Contracting companies will also be made aware that any contravention will be considered a breach of their contract and could result in its termination.

## FITNESS FOR DUTY AND APPLICABLE RULES

SemCAMS prohibits anyone being unfit for work due to the use of or after-effects of alcohol, illicit or illegal drugs, or the misuse of medications or other substances. In addition, to minimize the risk of unsafe or unsatisfactory performance due to the use of alcohol or other drugs, the following apply:

- **Illicit/Illegal Drugs:** While on Company business or on Company premises, the following are prohibited: the use, possession, distribution, offering or sale of illicit drugs, illegal drugs or drug paraphernalia; the possession, distribution, offering or sale of prescription medications for which a prescription has not legally been obtained; and the presence in the body of illicit or illegal drugs.

- **Alcohol:** The use, possession, distribution, offering or sale of alcoholic beverages on Company premises is prohibited; any exemption must be approved by the President. In all cases, employees and contract workers deemed to be occupying safety-sensitive positions are prohibited while on duty from having a blood alcohol concentration (“BAC”) in excess of 0.04% (0.04 grams per 100 ml).
- **Medications and Other Substances:** Employees and contract workers are expected to use medications, both prescribed and over-the-counter, responsibly. The intentional misuse of prescribed medications, over-the-counter medications and other substances (e.g., using the medication not as it has been prescribed or using someone else’s prescription medication) on Company business is prohibited. Medications of concern are those that inhibit or may inhibit an employee’s ability to perform their job safely and productively.

## SEARCHES

Unless prohibited by applicable law, SemCAMS reserves the right to conduct unannounced searches for alcohol, drugs, or drug paraphernalia on Company premises. Searches will be conducted where there are reasonable grounds to believe that any or all of these substances or things may be present. In addition to a search of Company premises, searches may include but not be limited to persons, personal effects, packages, desks, lockers, vehicles and other items or things. Searches will be directed by Human Resources in accordance with applicable laws and agreements and may be undertaken in cooperation with appropriate law enforcement agencies where required. Consultation with SemCAMS’s Human Resources and Legal must be initiated prior to any search.

Failure to permit a search, failure to cooperate during a search and any attempt to interfere with a search will be grounds for disciplinary action up to and including termination of employment.

## MANDATORY DISCLOSURE

Employees working in a safety-sensitive position are required to disclose current substance abuse problems, as well as past problems with alcohol or drugs (within the last 6 years).

## ALCOHOL AND DRUG TESTING

SemCAMS reserves the right to conduct alcohol and drug testing on its employees in the circumstances described below.

**Employees: Testing will be limited to employees who hold safety-sensitive positions and will be limited to the following situations:**

- **Pre-placement:** Pre-placement testing is required for all employees who will be employed into a safety-sensitive position.
- **Post-Incident:** Post-incident testing may be conducted after any incident or near miss where the investigator has reasonable grounds to believe alcohol or drug use may have been a contributing factor.

- **Reasonable Cause:** Reasonable cause testing may be conducted for employees in safety-sensitive positions who are suspected of being under the influence of illegal drugs, illicit drugs or alcohol. The decision to refer an employee for a test or an assessment will be based on specific, personal and documented observations. A referral for a test or assessment could be based on observed use or evidence of use of a drug or alcohol (e.g., smell of alcohol), and/or other indicators of chronic withdrawal effects of drugs and/or alcohol such as erratic or atypical behavior that has the potential to be unsafe to himself/herself or others.

In situations where referral for an assessment to SemCAMS's EAP Provider is not possible, a decision to request a test may be made on-site. This would be done with the involvement of a leader trained in this Policy in consultation with (and concurrence of) a second person representing one or more of EAP, Occupation Health Services, Legal, and Human Resources.

- **Return to Work After a Positive Test or Treatment:** Testing of an employee may be part of a monitoring program developed by EAP and/or treatment facility and the employee, when an employee is returning to work after treatment or a positive test result.
- **Legal Compliance:** Testing will be done for situations where testing is required by federal or provincial statute or regulation.

***Failure to report for a test, refusal to submit to a test, refusal to sign the consent form, or any attempt to tamper with a test sample may be grounds for disciplinary action up to and including termination of employment.***

**Contract workers:** It is not the Company's policy to conduct alcohol and drug testing on contract workers unless specifically required to ensure legal compliance.

## **PREVENTION, ASSESSMENT/REHABILITATION, AFTERCARE**

- **Prevention** SemCAMS emphasizes the importance of prevention and early identification of potential drug and alcohol problems. SemCAMS supports providing opportunities for prevention programs involving peers and support throughout Company operations.
- **Assessment/Rehabilitation** SemCAMS will make reasonable efforts to accommodate employees by providing a supportive environment for successful rehabilitation. No employee with an alcohol or drug abuse problem will be disciplined or involuntarily terminated solely for requesting help in overcoming the problem or because of involvement in a rehabilitation effort. This does not eliminate the requirement for the employee's participation in an aftercare program.

Employees holding designated safety-sensitive positions or required to drive in the course of work, may be reassigned temporarily to another position that is not safety-sensitive or assigned alternate duties, where practicable, until it can be determined that they can safely resume their job and our Occupational Health Service provider, in consultation with our Employee Assistance Program (EAP) provider, has removed any medical work limitation.

- **Aftercare** All employees who complete primary treatment (e.g., residential or out-patient treatment) for alcohol or drug abuse must participate in a structured aftercare program in order to help them maintain recovery. The Employee Assistance counselor, in consultation with Human Resources and the employee, will determine the appropriate aftercare arrangements on an individual basis.

## **POLICY VIOLATION AND DISCIPLINE**

A key purpose of this policy is to provide a safe and healthy work environment and as a result SemCAMS will not tolerate individual behavior that constitutes a risk to anyone's safety at work (self or others). Violation of this policy by employees will be considered a breach of a condition of employment. Employees who violate this policy, or do not meet satisfactory standards of work performance as a result of the abuse or misuse of alcohol, prescribed medications or other substances or the use of illegal or illicit drugs, will be subject to appropriate disciplinary action, up to and including termination of employment.

In all situations, an adequate assessment/review will be conducted, and documented, to verify that a policy violation has occurred before disciplinary action is taken. The appropriate disciplinary action for an employee in a particular case depends on the nature/seriousness of the policy violation.

Violation of this policy by contract workers will be considered a breach of a condition of their contract with SemCAMS and is cause for review, and possible termination of their contract. As well, contract workers, vendors and visitors found or suspected to be in violation of this policy will be denied access to Company premises.

To ensure that this policy continues to meet the established objectives and remains responsive to current circumstances as well as evolving needs, its implementation and revision will be monitored on an ongoing basis, and it will be subject to formal, periodic evaluation as appropriate.

## **COUNSEL**

Human Resources and Legal will provide counsel on the administration of this policy.

## **REFERENCES**

Policy 342 – Discipline  
Guideline 300G – Alcohol and Other Drug Use  
Guideline 342G – Discipline  
Progressive Discipline Process Chart

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Effective: 2002-07 Revised: 2008-04