

# Alcohol & Drug Practice

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## Purpose

Cenovus recognizes that the use of alcohol and drugs can adversely affect job performance, the work environment and the safety of our employees, contractors and the general public. To minimize the risk of adverse health effects and unsafe performance due to alcohol or drugs, Cenovus has implemented a comprehensive Alcohol & Drug Program, which consists of our Policy, Practices, Guideline and training. In all situations, workers are expected to report fit for work and remain fit for work throughout their workday or shift and when on scheduled call.

## Accountability

Personnel at all levels and in all areas of the Company are accountable for recognition and prevention of the inappropriate use of alcohol or drugs.

## Health and Safety (H&S)

- Oversee and effect changes to the Alcohol & Drug Program
- Develop and implement alcohol and drug guidelines for staff and service providers in safety sensitive positions
- Monitor compliance of safety-sensitive workers with the alcohol and drug program
- Coordinate and conduct incident investigations with due consideration of potential alcohol and drug impairment

## Security

- Manage alcohol and drug searches on Cenovus property and worksites

## Asset Teams

- Implement the Alcohol & Drug Program across all properties
- Assess and periodically review job categories in their areas to identify safety-sensitive positions and facilitate consistent use of this classification across the Company

## Human Resources Advisors

- Consult with and provide guidance to supervisors on the selection and application of disciplinary actions
- Communicate to individuals offered safety-sensitive positions the associated medical requirements (including pre-assignment drug testing) prior to employment start date



## Health & Wellness

- Oversee employee treatment, monitoring and return-to-work programs
- Oversee interpretation and communication of employee alcohol and drug testing results
- Perform duties of the Company Testing Administrator including liaison with the Substance Abuse Expert for employees
- Select, manage and audit both the service provider for alcohol and drug testing and the Medical Review Officer
- Support delivery of alcohol and drug awareness presentations
- Offer consultation services to employees who seek assistance with alcohol or drug concerns

## Legal

- Advise the Company on the protection of individual and corporate rights specifically related to the development, interpretation, implementation and defense of the Alcohol & Drug Program
- Consult with and provide guidance to Human Resources and supervisors on the selection and application of disciplinary actions

## Supervisors

- Monitor the work performance of teams, coaching staff to make appropriate decisions about alcohol and drug use
- Ensure employees are aware of the Employee and Family Assistance Program
- If employees ask for help in dealing with personal alcohol and drug concerns, guide them to appropriate resources while maintaining confidentiality as required under Cenovus's Privacy Policy and Employee Privacy Practice
- Investigate situations where there are reasonable grounds to believe there has been a violation of the Alcohol & Drug Program
- Monitor contractor compliance and report to H&S any violations or suspected violations of the Alcohol & Drug Program
- When alcohol and drug tests are required, follow the Cenovus Alcohol and Drug Testing Guideline to arrange for testing in a timely manner

## Employees

- Read, understand and comply with Cenovus's Alcohol & Drug Program
- Report immediately to a supervisor, situations where there are reasonable grounds to believe a co-worker is not fit for work
- Be aware of resources available and take responsibility for resolving personal alcohol and drug problems
- Cooperate with any investigation into a possible violation of the Alcohol & Drug Program.

## Contractors and Service Providers

- Adopt and enforce alcohol and drug policies and practices that are consistent with Cenovus's Alcohol and Drug Program
- Provide proof of compliance with alcohol and drug policies upon request, and cooperate with audits of alcohol and drug policies and practices to ensure consistency with Cenovus's expectations

## Cenovus Expectations

### Fitness for work

All staff and service providers must arrive and remain fit for work while on Company business, on Company premises, when on scheduled call and when assisting with an emergency. Fit for work means being able to safely and acceptably perform assigned duties and responsibilities.

## All staff and service providers

To maintain fitness for work, all staff while on Company business, on Company premises and when on scheduled call, are prohibited from:

- Using any drugs or drug paraphernalia that are illegal to use or possess
- Using prescription medications that are not prescribed to them
- Using inappropriately any prescription or non-prescription medication that could cause impairment
- Having a blood alcohol content greater than 0.04% (e.g. one or two alcoholic beverages can produce a blood alcohol content of 0.04% or greater)

At camp locations, stricter requirements (e.g. zero tolerance) may be imposed by providing notification of such requirements.

## Safety Sensitive Positions

In addition to fitness for work requirements for all staff and service providers above, personnel in safety-sensitive positions:

- Are prohibited from consuming any product containing alcohol during their work hours, during meals or breaks, and when on scheduled call

## Alcohol and business travel

Provided fitness-for-work standards are maintained and site rules are respected, employees are permitted to:

- Responsibly consume alcohol when on Company business away from the worksite (e.g. business travel, conference attendance)
- Responsibly consume alcohol on corporate and charter aircraft
- Carry sealed containers of alcohol in the trunk of a personal vehicle when traveling on Company business

## Social events

To ensure responsible alcohol consumption at company-wide and other organized social events, event coordinators must implement reasonable measures as described under the Meetings & Events Practice.

The consumption, possession, distribution, offering or sale of beverage alcohol at company-wide social events and organized internal group or team events must be pre-approved by the appropriate Vice-President of the Operations or Group hosting the event.

## Medications

All staff are expected to use prescribed and non-prescribed medications responsibly. In the case of prescription medications, the prescriptions must be in the staff member's name.

In addition, staff are expected to:

- Consult their personal physician or pharmacist to determine if use of a medication could have a negative impact on work performance and take appropriate steps to minimize associated risks
- Advise Health & Wellness or their supervisor of any need for modified duties as a result of medication use

## Incidents

After any incident, personnel involved in the incident are prohibited from using alcohol and drugs within the first eight hours of the incident, or until tested or advised by the Company that a test is not required. Staff members are

not prohibited from taking prescribed medications provided the prescription is in the individual's name and it is taken as prescribed.

## Impaired driving charges

All staff required to operate any motor vehicle on behalf of the Company must maintain a valid driver's license as a condition of employment.

Staff must report to their supervisor any of the following incidents within 24 hours of the occurrence:

- Impaired driving charge obtained while operating a Cenovus vehicle
- Impaired driving charge obtained while operating a non-Cenovus vehicle while on Cenovus business
- Temporary loss of license as a result of any impaired driving charge
- Loss of license due to an impaired driving conviction

Where holding a valid driver's license is a condition of employment or contract, loss of the license may result in the staff member no longer being qualified for the position held.

## Service Providers

Cenovus expects that all service providers will have a fully implemented alcohol and drug program that meets or exceeds the Cenovus program.

## Searches

To detect, locate and mitigate drug and alcohol possession, searches may be conducted of premises owned, contracted or otherwise controlled by the Company, in accordance with the Cenovus Search Practice.

## Substance Dependency (Employee)

### Voluntary assessment and treatment

Cenovus provides support to employees who pursue help with personal alcohol and drug problems. In cases where employees choose not to request help and where there are reasonable grounds to believe work performance is negatively affected by alcohol or drug use, Cenovus will intervene in accordance with its Alcohol & Drug Program.

Employees who are concerned that they are developing or may have a problem with alcohol or drugs are encouraged to:

- Contact the Company's Employee and Family Assistance Program, their personal physician, an appropriate community service, or Health & Wellness
- Follow appropriate treatment before work performance is affected

## Work modifications

A medical work modification may be issued, and the employee may be assigned to alternate duties when:

- A qualified professional (i.e. Medical Review Officer, Substance Abuse Expert, personal physician) advises Health & Wellness that an employee's consumption of alcohol or use of drugs may be preventing the employee from doing their job safely
- Health & Wellness consults, on a confidential basis, with an employee and their treating physician (with the employee's consent) regarding the nature and duration of any potential work modification

## Short-term disability

Employees under active medical care and who are unable to work due to attendance at a recognized treatment program, may qualify for short-term disability benefits. Employees must comply with Cenovus's Disability Management Practice as well as prescribed treatment programs, which may include counseling and other assessments or programs as necessary to maintain eligibility for short-term disability benefits.

## Testing

Alcohol and drug testing is just one process used to identify and control consumption of alcohol and use of drugs in the workplace. Testing and testing procedures are designed to respect the individual's privacy and meet applicable requirements for confidentiality, accuracy and quality. Every decision to test or not test will be clearly documented and include date, time, description of events and information that lead to the decision.

Cenovus conducts alcohol and drug testing in the following situations.

### Pre-assignment testing

All staff offered safety-sensitive positions must pass a drug test as a condition of work in that position, whether as a condition of hire for a new staff member or as a result of a change in position for an existing staff member.

Failure to pass the test or refusal to participate in the testing process means the applicant is not eligible for the safety-sensitive position.

### Reasonable-grounds testing

Reasonable-grounds testing is conducted when an individual's actions, appearance or conduct while at work give reasonable grounds to suspect the consumption of alcohol or use of drugs. If a supervisor or other individual reasonably believes there are reasonable grounds, they should engage a second person on site to confirm the assessment of the individual's actions, appearance and conduct, in accordance with the Alcohol and Drug Testing Guideline. Referral of an individual for testing will be based on specific, personal observations.

### Post-incident testing

Post-incident testing may be conducted as part of a full investigation into a work-related incident, where it has been determined by the supervisor or the H & S representative investigating the incident that the individual's actions or omissions could have contributed to the occurrence.

## Refusal to be tested

Any refusal to comply with a testing request is considered as a violation of Cenovus Alcohol and Drug Policy. This includes:

- Failure to report or attempts to delay reporting for a test
- Refusals to submit to a test
- Refusals to agree to disclosure of a test result to the Company
- Confirmed attempts to tamper with a test sample

## Testing procedures and limits

Cenovus testing procedures and limits are consistent with the provisions set out by the U.S. Department of Transportation and Department of Health and Human Services. Testing will be conducted in accordance to Cenovus's Privacy Policy, Employee Privacy Practice and other applicable privacy legislation.

A confirmed positive test result will be considered a violation of the Alcohol & Drug Program, whether or not the alcoholic beverage or drugs were actually consumed on Cenovus business or premises.

## Positive tests

A positive alcohol test is one in which the blood-alcohol content is defined as at or above 0.04% for non-safety sensitive positions and above the detection limit for safety-sensitive positions.

A positive drug test is one in which the amount of drug confirmed in a sample is at or exceeds the cut-off levels established by the U.S. Department of Health and Human Services for workplace testing programs throughout North America.

If a test result is positive, a Medical Review Officer will review the result with the individual to determine if it could have resulted from the legitimate use of medications or another medical explanation. The Medical Review Officer determines if the result will be reported as a negative or verified positive.

## Violations

In all situations, verification of a violation will occur before disciplinary action is taken. The resulting discipline will be case-specific and determined by the Asset team in consultation with H&S and Legal.

## Employees

Termination of employment may result from certain violations of the Cenovus Alcohol and Drug Program, including (but not limited to):

- The use, possession, distribution or offering for sale of drugs that are illegal to use or possess, while on Company business or premises
- The purchase, possession, distribution or offering for sale of unauthorized alcohol (e.g. bootleg) while on Company business or premises
- Any attempt to delay reporting for a test, refusal to submit to a test, refusal to agree to disclosure of a test result to the Company, or a confirmed attempt to tamper with a test sample
- Failure to report an impaired driving charge obtained when operating a Company vehicle or operating a vehicle on Company business
- Loss of driver's license due to an impaired driving conviction when a valid drivers license is a condition of employment or engagement
- Failure to meet the requirements of a treatment or after-treatment program
- Non-compliance with this practice

In those situations where the Company elects to continue employment after a violation, the employee involved will be required to enter into a written agreement outlining requirements for their continued employment. These requirements may include:

- Temporary removal from their position or assigned alternative duties
- Assessment by a Substance Abuse Expert to determine the need for a structured treatment program
- Following a treatment and or after-treatment program
- Submitting to unannounced testing for a specified period of time

## Service Providers

Failure of a service provider to have an acceptable alcohol and drug policy or practice, or to take actions in accordance with the policy or practice, may result in the applicable agreement for services (e.g. Master Service and Supply Agreement, Contractor Services Agreement, Purchase Order) being terminated by Cenovus. Individuals working for service providers and found in violation of their company alcohol and drug policy will be dismissed from the worksite.

## Confidentiality

Confidentiality will be maintained. Identification of fitness to work or failure to comply with treatment recommendations will be disclosed to the supervisor and Human Resources Advisor. Medical information will be handled (including collection, use, disclosure, storage and retention) in compliance with all applicable privacy legislation.

## Glossary

**Company Business** – All business activities undertaken in the course of the Company's operations, whether conducted on or off company premises. It includes those situations when an employee is representing, or could reasonably be perceived as representing the Company in the performance of their duties.

**Company Premises** – Includes, but is not necessarily restricted to, all land, property, structures, installations, vehicles, and equipment owned, leased, rented, operated or otherwise directly controlled by the Company for the purpose of conducting company business.

**Company Testing Administrator** – The person responsible for overseeing the Alcohol and Drug Practice.

**Contractor** – Individuals who are engaged through an external company to provide services related to day to day business, operations, or on a specific project of Cenovus. Individuals are screened and selected based on their particular knowledge, skills and capabilities, and typically have an expected start and end date. The company pays the individuals through the company's payroll, provides workers' compensation coverage and specified levels of insurance, and makes statutory remittances for the individuals.

Contractor types include:

- Agency contractors
  - Individuals who are engaged through an agency, such as Bowen or Diversified; may include potential candidates that the agency may identify for consideration to Cenovus
    - Sample job title: Contract Accountant, Contract Drilling Supervisor etc.
- Students
  - Individuals who are agency contractors who are coordinated by Cenovus's campus recruitment team
    - Sample job title: Student Engineer, Student Geologist, etc.
- Independent contractors
  - Individuals who are engaged through a personal services or numbered company who provide services to Cenovus through a service agreement (e.g. MSSA, MESA, MSA, CSA, etc.)
    - Sample job title: Contract Electrician, Contract Health & Safety Advisor, etc.

**Employee and Family Assistance Program** – Cenovus's Employee and Family Assistance Program provides you and your family with confidential counseling on issues that affect well-being, health or work performance. Services are available for personal difficulties such as marital or family issues, stress management, alcohol/drug or other dependencies, bereavement and child or eldercare.

**Employee Privacy Practice** – Practice governing personal information collected from and about our employees

**Impaired Driving** – Operating a vehicle while performance is adversely affected by alcohol or drugs, evaluated by testing with a blood alcohol limit at or above established criteria.

**Medical Review Officer** – A licensed physician certified as a Medical Review Officer who is independent of the Company and who is responsible for receiving the laboratory report and reviewing any non-negative results with the employee to determine any alternative medical reasons for the result before reporting to the employer. The MRO makes the final decision on whether it is a verified positive, a verified refusal (adulterated or substituted) or a negative result.

**Pre-assignment** – Prior to starting a new safety sensitive position, whether that is the result of new employment, transfer, or reclassification of an existing position.

**Privacy Policy** – Cenovus's commitment to protecting the privacy of the personal information which is collected, used and disclosed in the conduct of its business.

**Safety-Sensitive Position** – All positions in which an individual has a key and direct role in an operation where impaired performance could result in:

- An accident or incident affecting the health or safety of themselves, other employees, contractors, customers, the public or the environment, or
- An inadequate response to an emergency or operational situation

**Safety-Sensitive Workers** – Personnel who work in safety-sensitive positions

**Service Providers** – A subset of contractors, service providers are independent incorporated business entities engaged to provide services for Cenovus. Services and deliverables are outlined in a written agreement between the entity and Cenovus. Individuals performing the services are engaged by the business entity, which provides the business infrastructure to manage its workforce. Service providers are generally companies Cenovus has selected to perform a service without specifying the individuals who will provide the service (e.g. document reproduction services; services for drilling, completions and workovers). Service providers may conduct their work onsite at Cenovus facilities or offsite from their own facilities.

**Staff** – Individuals who conduct work for the benefit of Cenovus, including employees and contractors, but excluding service providers.

**Substance Abuse Expert** – An individual with clinical knowledge and experience in the diagnosis and treatment of alcohol and drug-related disorders and certified as a Substance Abuse Expert.

**Testing Program Administrator** – A service provider engaged to:

- Manage sample collection
- Provide Medical Review Officer services
- Liaise with the Company Testing Administrator
- Administer the selection process for unannounced testing in accordance with the Alcohol & Drug Policy and Practices
- Select test days for those on a follow-up testing program