

Alcohol & Drug Standard

Owner: Manager, Health, Safety, Environment & Regulatory

Effective date: June 1, 2011

Last updated: September 14, 2018

Last reviewed: September 14, 2018

Purpose

Cenovus is committed to providing a safe and healthy workplace. This Standard is intended to help ensure the safest possible working environment, free of negative impacts of drug, alcohol or other substance use, as part of that commitment.

The use of alcohol, drugs and certain medications may have serious adverse effects on job performance, staff health and safety, and the well-being of others. It can also place the integrity and safety of Cenovus's operations at risk. To support our commitment to providing a safe and healthy workplace, Cenovus has put in place this Standard to address our expectations associated with the use and/or misuse of alcohol, drugs and medication which affect work performance, conduct and safety.

Scope

This Standard and its related policies and procedures (collectively "Alcohol & Drug Program") apply to all staff when they are engaged in Company business, working on or off Company premises, when driving Company vehicles, and when on call.

Staff must inform visitors of the requirements of this Standard prior to their attendance and ensure that the visitor is accompanied by a staff member at all times while conducting Company business. Any visitor acting in contravention of this Standard will be denied access to or will be removed from Company premises immediately.

Cenovus's suppliers and service providers are expected to develop and enforce alcohol and drug policies and procedures that meet or exceed the Cenovus Alcohol & Drug Program.

Roles and Responsibilities

All Cenovus staff are accountable for recognition and prevention of the inappropriate use of alcohol, drugs, and medication.

Employees

- Read, understand and comply with the Alcohol & Drug Program and all related training
- Disclose and take responsibility for resolving personal alcohol and drug problems in accordance with this Standard
- Cooperate with any investigation into a possible violation of the Alcohol & Drug Program

Supervisors

- Recognize the effects of alcohol, drugs and medications in the workplace and monitor the work performance of teams and take action regarding any violations or suspected violations of the Cenovus's Alcohol and Drug Program.

- For field supervisors, use the *Field Supervisors' Fit for Duty Guide* to assist in monitoring and addressing fitness for duty issues, including implementing the Alcohol & Drug Program
- Ensure employees are aware of the Employee and Family Assistance Program (EFAP), and when employees ask for help in dealing with personal concerns, or as otherwise appropriate, refer affected employees to appropriate Company resources where appropriate
- Maintain confidentiality in compliance with the Privacy Policy and Employee Privacy Practice
- Monitor situations where there are reasonable grounds to believe there has been a violation of the Alcohol & Drug Program, and promptly refer those situations to Security, OHW, H&S and/or their HRBP in accordance with the *Field Supervisors' Fit for Duty Guide*
- Monitor contractor compliance and report to Health & Safety (H&S) any violations or suspected violations of the Alcohol & Drug Program
- When alcohol and drug tests are required, follow the Alcohol & Drug Testing Procedure to arrange for testing in a timely manner

Service Providers/Suppliers

- Adopt and enforce alcohol and drug policies and procedures that meet or exceed Cenovus's Alcohol & Drug Program
- Actively promote a safe and healthy work environment that strives to eliminate any negative effects due to the inappropriate use of alcohol, drugs or medication;
- Take appropriate action if one of their workers appears to be or is found to be in an unfit condition at work;
- Upon request by Cenovus, provide proof of compliance with alcohol and drug policies, and cooperate with audits of alcohol and drug policies and practices to ensure such practices meet or exceed Cenovus's Alcohol and Drug Program

Health & Safety (H&S)

- Oversee the Alcohol & Drug Program
- Review and modify the Alcohol & Drug Program as necessary to respond to current circumstances and evolving needs
- Assist supervisors as need in monitoring compliance of safety-sensitive workers with the Alcohol & Drug Program
- Coordinate and conduct incident investigations with due consideration of potential alcohol and drug impairment

Enterprise Security

- Manage alcohol and drug searches in accordance with the Search Procedure
- Deliver education and awareness sessions on contraband identification and handling suspicious substances
- Manage access restrictions for workers who are banned for alcohol & drug violations

Human Resources Business Partners (HRBPs) (People Services)

- 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

Occupational Health & Wellness (OH&W)

- 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 and manage 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

- Consult with and provide guidance to Human Resources and supervisors on the selection and application of disciplinary actions.

Standard Statements

Substances and Applicable Rules

All staff and service providers must report fit for duty and remain fit for duty while engaged in Company business, while on Company premises, when on call and when assisting with an emergency.

All staff while engaged in Company business, while on Company premises, when on call, or when assisting with an emergency, are prohibited from:

- Possessing, distributing, offering for sale, using or consuming drugs or drug paraphernalia
- Offering for sale of any medication, or using any medications other than as permitted in this Standard
- The unauthorized possession, distribution, or offering for sale of beverage alcohol
- Possessing, distributing or consuming any product containing alcohol while working in a safety sensitive position, including during meals or breaks
- Possessing or using any product or device that could tamper with any sample for an alcohol or drug test
- Reporting for work or working:
 - with an alcohol level equal to or greater than 0.04 grams per 210 litres of breath
 - with a drug level equal to or greater than the concentrations for the drugs set out in the Alcohol & Drug Testing Procedure
 - while their ability to safely perform their duties is adversely affected because of the use of alcohol, drugs, or medication

Conditions for Permission of Possession or Use of Medication

Staff are expected to use all medication responsibly. Cenovus permits staff to possess or use medication under the following conditions:

- Any prescription medication in the staff member's possession or used by them must be prescribed to that individual staff member.
- The staff member must consult their personal physician or pharmacist, as applicable, to determine if use of the prescription or non-prescription medication could affect the ability to perform their work safely, and take appropriate steps to minimize associated risks.
- If employed in a safety-sensitive position, the staff member must have express agreement from a licensed medical practitioner that the medication does not affect the ability of the staff member to operate safely.

- d. The staff member must use the medication for its intended purpose and in the manner directed by their physician, pharmacist or the manufacturer of the drug.
- e. The medication must not adversely affect the staff member's ability to safely perform their duties.
- f. Where available, the staff member must choose a safe alternative medication in preference to a medication that may affect the staff member's ability to safely perform their duties;
- g. The staff member must notify OH&W or the staff member's supervisor, before starting work, if they are taking medication that may affect their ability to perform their work safely, and the need for any modified duties as a result.

Incidents

After any incident, staff involved in the incident are prohibited from using alcohol or drugs for eight hours immediately following the incident, or until tested or advised by their supervisor that a test is not required. Staff are not prohibited from taking medications, provided that they are taken in compliance with this Standard, including as directed by a pharmacist or physician, and with any potential impact on safe performance reported in advance to their supervisor or OH&W.

Impaired driving charges

All staff required to operate any motor vehicle on behalf of the Company must follow the Fleet requirements & responsibilities, including the Vehicle Practice and Travel Standard.

If driving is required in their job duties, staff must report to their supervisor any of the following incidents within 24 hours of the occurrence:

- Impaired driving charge
- 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.

If an employee fails to report the conviction and loss of license and continues to drive for Cenovus then as soon as Cenovus becomes aware of the situation, discipline may occur, up to and including termination of employment for cause.

Duty to Report

Staff must immediately report to a supervisor or OH&W (or to on-site medical staff, Security, Health & Safety, a Human Resources Business Partner, the Integrity Helpline, or the Investigations Committee) any situation where there are reasonable grounds to believe that they, or a co-worker, is not fit for duty, including for reasons related to alcohol, drug or medication use.

In addition to the disclosure requirements with respect to medications and lack of fitness, employees who are concerned that they are developing or may have a substance use or dependency problem with alcohol, drugs or medication must promptly advise their supervisor or OH&W, and follow appropriate treatment as required by Cenovus.

Disciplinary action cannot be avoided by disclosure post-incident that the employee has a substance use issue or is already involved in a treatment program. However, no employee with substance use or dependency problem will be disciplined for requesting help in overcoming their problem, so long as they sought and accessed help before being notified that they must report for an alcohol or drug test under the Alcohol & Drug Testing

Procedure, and so long as they comply with any terms of return to work in place between the employee and Cenovus.

Work modifications

Where an employee has disclosed use of a medication that may impact their ability to perform their work safely, or a substance use or dependency problem prior to an incident and/or being directed to report for an alcohol or drug test, the employee may be assigned to alternate duties when a qualified professional advises OH&W that an employee's consumption of alcohol, drugs or medication may be preventing the employee from doing their job safely.

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 the Disability Management Practice, and any prescribed treatment programs, including counseling and other assessments or programs as necessary to maintain eligibility for short-term disability benefits.

Removal from and return to work

Where an employee has disclosed a substance use or dependency problem, or in the opinion of OH&W or a qualified professional, there is a risk that an employee is not able to do their job safely, the employee will be removed from duty or placed in a modified non-safety sensitive position, at Cenovus's sole discretion, until Cenovus has received a fit for duty clearance from Occupational Health and Wellness.

All employees who receive assistance or treatment as a result of a substance use or dependency problem must comply with the terms and conditions of any rehabilitation program established as a condition of returning to work and as a condition of their continued employment with Cenovus. All employees who complete a primary treatment program will be subject to a return to work agreement.

Employees returning to work will also be subject to unannounced or periodic return to work follow up alcohol and/or drug testing.

Before returning to work the employee must have a fit for duty clearance from OH&W.

Searches

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

Testing

Alcohol and drug testing is one mechanism used to identify and control consumption of alcohol and use of drugs in the workplace. A confirmed positive test result will be considered a violation of the Alcohol & Drug Program, whether or not the alcohol or drugs were actually consumed on Company business or premises. For more details on the testing criteria and administration, see the Alcohol & Drug Testing Procedure.

Pre-assignment/placement testing

All staff offered safety sensitive positions must pass a pre-assignment/placement alcohol and 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 or use of alcohol, drugs or certain medications. If a supervisor or other individual reasonably believes there are reasonable grounds, where possible they must engage a second person to confirm the assessment of the individual's actions, appearance and conduct, in accordance with the Alcohol & Drug Testing Procedure. Referral of an individual for testing will be based on personal observations. Examples of reasonable grounds may include, but are not limited to:

- Direct visual observation of a policy violation;
- Discovery of alcohol or illicit drugs in a company vehicle or on company premises that can reasonably be associated with a particular staff member;
- Direct visual observation of physical or behavioural signs (e.g. difficulty in maintaining coordination, slurred speech, smell of alcohol on breath, extreme drowsiness);
- Pattern of failure to follow safety rules or operating procedures.

Post-incident or near miss testing

Post-incident or near miss 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 attempt to delay reporting for a test
- Refusal to submit to a test
- Refusal to agree to disclosure of a test result to Cenovus

Tampering

Tampering with or altering an alcohol or drug sample request is considered as a violation of this Standard.

Exceptions

Alcohol and business travel

Provided fitness for duty requirements are maintained, employees who are not safety-sensitive and not located where alcohol consumption is prohibited, such as in camps and at sites, are permitted to:

- Responsibly consume alcohol when on Company business away from Company premises (e.g. business travel, conference attendance)
- Responsibly consume alcohol on corporate and charter aircraft

Social events

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

Confidentiality

Cenovus is committed to exercising reasonable care and precaution, in accordance with the Privacy Policy and applicable laws, to protect employees' confidentiality in all aspects of applying this Standard, except where disclosure is necessary for related health and safety concerns, there is deemed to be a potential for risk to self, others, or to Cenovus, where disclosure is required by law, or where disclosure is required to assist in the employee's return to work.

Employee information, including medical information, will be handled (including collection, use, disclosure, storage and retention) in compliance with Cenovus's Privacy Policy, Employee Privacy Practice and all applicable privacy legislation.

Compliance and Enforcement

Monitoring

Health & Safety is responsible for monitoring compliance to this standard and related processes through periodic reviews and assessments.

Incidents of non-compliance are to be reported to your Supervisor, a Human Resources Business Partner, the Integrity Helpline or the Investigations Committee.

Consequences of Non-compliance

Violations of this Standard may result in disciplinary action, up to and including termination of employment or contract.

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 denied access to or removed from Company premises.

Support

Contact Occupational Health & Wellness for any question or concerns about this standard.

Related Policies/Standards

- Fit for Duty Policy
- Alcohol & Drug Standard
 - Alcohol & Drug Testing Procedure
 - Search Procedure
 - Life Saving Rules
- Work Health Standard
 - Fatigue Management Procedure

- Safety Sensitive Position Standard
- Field Supervisors' Fit for Duty Guide
- Contractor Health and Safety Program Requirements
- Privacy Policy
 - Employee Privacy Practice
- Fleet Vehicle Practice
- Travel Standard
- Meetings & Events Practice

Glossary

Alcohol – Any substance that may be consumed and that has an alcoholic content in excess of 0.5 percent by volume.

Alcohol & Drug Program – Includes, but is not limited to all documents and processes associated with managing alcohol & drugs at Cenovus, such as Fit For Duty Policy, Alcohol & Drug Standard, Search Procedure, Alcohol & Drug Testing Procedure, Life Saving Rule, and Safety Sensitive Position Standard.

Company or Cenovus – means Cenovus Energy Inc. and its Affiliates. **Affiliate** includes any Company, person, partnership or other legal entity which controls or is controlled by Cenovus Energy Inc.

Company business – All business activities undertaken in the course of Cenovus'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 Cenovus in the performance of their duties.

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

Company Testing Administrator – The person responsible for conducting testing under the Alcohol & Drug Testing Procedure.

Contractor – An individual working indirectly for Cenovus through an approved supplier of individuals (such as Adecco) for a defined period of time.

Drug or Drugs – includes any drug, substance, chemical or agent, the use or possession of which is unlawful in Canada, and also includes any otherwise legal but illicitly-used substances, including medications and non-prescription medications obtained without proper medical authorization or not used as indicated, any cannabis products (including Tetrahydrocannabinol (THC) or Cannabinoid (CBD)-containing substances that are not medications, synthetic forms of illegal substances (e.g. synthetic marijuana, synthetic cocaine and amphetamine analogues, etc.) and other substances not being used for their intended purposes.

Drug Paraphernalia – Includes any personal property, equipment, product or accessory which is associated with or manufactured for the making, use, or concealment of any drug, or any item intended to mask or alter the outcome of an alcohol or drug test.

Employee – Individuals employed by Cenovus or its subsidiaries (collectively "Cenovus") and on Cenovus's payroll.

Employee and Family Assistance Program or EFAP – Cenovus's Employee and Family Assistance Program provides Cenovus employees and their families 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.

Fitness for duty – a state of physical and mental fitness to perform assigned duties with competence and in a safe manner, as compared to established performance standards.

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 or MRO – 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 positive 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.

Medication – both Prescription and Non-Prescription Medications.

Non-Prescription Medications – substances, chemicals, or agents used for medicinal purposes that can be lawfully purchased and consumed without a prescription.

On Call – Employees who have been designated as being on-call in accordance with a communicated schedule.

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

Prescription Medication – any substance, chemical or agent used for medicinal purposes that is obtained through prescription. For the purposes of Cenovus's Alcohol & Drug Standard and all related documents, a "prescription" includes a medical document as that term is defined in the *Access to Cannabis for Medical Purposes Regulations*.

Safety-Sensitive Position – As set out in the Safety Sensitive Position Standard

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

Supplier or Service Provider – Entity or party that agrees to furnish Cenovus with a certain number or quantity of goods, material, personnel and/or services. The word "vendor" has also been used.

Staff – Individuals who conduct work for the benefit of Cenovus, including employees and contractors, but excluding suppliers/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 Standard, as well as the Alcohol & Drug Testing Procedure
- Select test days for those on a follow-up testing program

Visitor – Someone attending on Company premises on an interim basis.

Workers – All working personnel on a Cenovus site, including employees, contractors, and supplier/service provider personnel.