Policies and Procedures	Number of Pages	
Jacobson & Greiner Group of Companies	Originator BOARD OF DIRECTORS	
Title	Effective Date	Replaces
DRUG & ALCOHOL POLICY	21 st December, 2018	N/A

PURPOSE: The Jacobson & Greiner Group is concerned about the use of alcohol, drugs and medications as it may affect the workplace and its employees. The use of such substances can limit and impair an employee's ability to perform his or her job duties in a safe and productive manner. An employee's impairment can affect the health and wellness of our employees, and the general wellbeing of our work environment. The safety of our work environment is especially concerning in the case of safety-sensitive positions or job duties.

The objective of this policy is to ensure that safeguards are in place to promote a safe, productive, efficient and healthy work environment and to minimize the risk of impaired performance and possible injuries, accidents, damage or property loss. We further seek to promote and identify employees who may suffer from a drug and/or alcohol disability and to ensure such employees will seek or obtain appropriate and timely treatment before a workplace issue arises

DEFINITIONS: For the purposes of this Policy, the following definitions will apply:

ALCOHOL – means the intoxicating agent in beverage alcohol, ethyl alcohol or other low molecular weight alcohols including methyl and isopropyl alcohol. This definition includes, but is not limited to, such things as beer, wine, spirits or other intoxicating liquids.

COMPANY – means Jacobson & Greiner Group Ltd. and all of its subsidiaries.

DRUG – means any substance, the use of which has the potential to change or alter the way a person thinks, feels or functions in such a manner that the employee may no longer be Fit for Work. A Drug includes illegal or street drugs, marijuana, solvents or inhalants, and prescription medications acquired without a valid prescription, used for a purpose outside of what it was prescribed for, or misused in any other intentional way.

FIT FOR WORK - means being able to perform assigned job duties in a safe and productive manner at a level that meets the supervisor's performance and safety expectations for the position, free from intoxication or impairment.

MEDICATIONS – means a substance that requires a personal prescription from a treating physician and any over the counter substances that may be obtained to treat illness or injury.

SAFETY-SENSITIVE POSITIONS – A "Safety Sensitive Position" is a job or position where the employee holding this position has the responsibility to his/her own safety and other people's safety.

PROHIBITED BEHAVIOURS AND CONDUCT: The following rules and standards of conduct apply to all employees during work hours whether on Company property, away from Company property, or during meals and rest periods:

- 1) Employees must at all times be Fit for Work;
- 2) Employees shall not possess, use, or distribute Alcohol or Drugs
- 3) The use of Alcohol may be permitted at a sanctioned Company social event. If an employee chooses to consume alcohol at a Company event, they must find alternative transportation. Drinking and driving and/or driving under the influence is prohibited and participating in such activity may result in disciplinary action, up to and including termination of employment.
- Employees shall not be impaired while under the influence of any Alcohol, Drugs or Medications while operating any Company vehicle and must abide by all traffic laws;
- 5) Employees may possess and use Medications provided the employee remains Fit for Work. Where the use of Medications, including their side-effects, could

inhibit or impair an individual's ability to carry out his or her job duties safely, including affecting the safety or well-being of others, the employee must inform a supervisor of such use of Medications before starting or resuming work.

Where there are grounds to believe that an employee may not be Fit for Work during the course of working hours, management may remove the employee from their duties, or implement other measures to deal with the situation.

The Company reserves the right to conduct searches of Company property and/or personal property for locating Alcohol or Drugs where there are reasonable grounds to do so. The Company may also bring any illegal or unlawful conduct associated with Alcohol or Drugs to the attention of appropriate law enforcement authorities.

The Company may consider any criminal conviction related to the possession or sale of Drugs to be conduct requiring discipline, including termination.

ALCOHOL OR DRUG DEPENDENCY REPORTING REQUIREMENT: Employees who suspect they have an Alcohol or Drug dependency or any disabling condition related to the use of Alcohol or Drugs, are required to disclose such circumstances to their supervisor. Management will make reasonable efforts to accommodate the employee's treatment (in accordance with its obligations as may exist at law) and will treat all such reporting by the employee in confidence. In this manner, management wishes to ensure there is early identification and treatment in cases of Alcohol and/or Drug related disabilities, and to ensure the safety, health and well-being of its employees and others within the work environment.

POST INCIDENT DRUG AND ALCOHOL TESTING: The Company reserves the right to require post incident drug and alcohol testing when a serious incident occurs. A drug and alcohol test will only be done when a serious incident occurs, and the preliminary investigation confirms that an employee's actions or omission were part of the root cause of the incident.

THE WORKPLACE SAFETY AND HEALTH REGULATION DEFINES A SERIOUS INCIDENT AS ONE:

- in which a worker is killed;
- in which a worker suffers:
 - o an injury resulting from electrical contact,
 - o unconsciousness as the result of a concussion,
 - o a fracture of his or her skull, spine, pelvis, arm, leg, hand or foot,
 - o amputation of an arm, leg, hand, foot, finger or toe,
 - third degree burns,
 - o permanent or temporary loss of sight,
 - a cut or laceration that requires medical treatment at a hospital as defined in The Health Services Insurance Act, or
 - asphyxiation or poisoning; or

that involves

- the collapse or structural failure of a building, structure, crane, hoist, lift, temporary support system or excavation,
- an explosion, fire or flood, an uncontrolled spill or escape of a hazardous substance, or
- o the failure of an atmosphere-supplying respirator.

VIOLATIONS OF THE POLICY: Any violation of this Policy, may result in disciplinary action, up to and including termination of employment.