

DRUG, ALCOHOL & CANNABIS POLICY

PETRONAS ENERGY CANADA LTD.

DOCUMENT AUTHORIZATION

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1. Summary Statement

The Company recognizes that use of Drugs, Alcohol and some Medications can adversely impact the safety and well-being of Employees, Contractors, members of the public, and potentially the communities in which it operates. The Company is committed to providing a safe and healthy work environment and to maintaining the public's trust and confidence.

The Company and those acting on its behalf share a responsibility to ensure the safety of everyone affected by the Company's activities. Awareness of the potential risks associated with the use of Alcohol, Drugs and Medication helps to create and maintain a safe and healthy workplace.

The Company has created this Policy, and its Supporting Procedures, to minimize risks associated with Drugs and Alcohol on Company Premises as well as ensuring compliance with applicable laws and the Company's corporate governance, including but not limited to the Code of Business Conduct and Ethics Policy and the Health, Safety, Security and Environment Policy. This Policy is part of a comprehensive and multi-faceted approach to safety and health.

The Company protects all personal information acquired in connection with this Policy, including the results of any Drug or Alcohol testing, in accordance with the Privacy Policy.

2. Objectives

The objectives of this Policy are to:

- Minimize the health and safety risks associated with the use of Drugs and Alcohol;
- Ensure that all individuals attend work Fit for Duty and outline the Company's expectations regarding Fitness for Duty;
- Outline the prohibitions against the possession and use of Drugs and Alcohol on Company Premises;
- Encourage prevention and assistance for Drug and Alcohol issues;
- Reserve the Company's right to conduct Drug and Alcohol testing and related searches;
- Set out the potential consequences following a violation of this Policy; and
- Outline situations in which the reasonable use of Alcohol may be permitted.

3. Scope

This Policy applies to all Employees, Company Business, and Company Premises.

Contractors (including self-employed contractors), are required to implement and adhere to a policy which has standards at least as stringent as those set out in this Policy and its Supporting Procedures, or agree to implement this Policy and adopt and enforce it as their own. Contractors are also required to cooperate with the Company as it relates to enforcing their own or this Policy and provide proof to confirm that appropriate implementation and enforcement of their own or this Policy and its Supporting Procedures is in place.

4. Definitions

Capitalized terms used herein have their meanings as set out below or as found in the Company's Master Glossary.

Alcohol	Any substance that may be consumed and that has an alcoholic content in excess of 0.5 per cent by volume.	
Company Premises	Includes, but is not limited to, all offices, land, facilities, operations, camps, vehicles, Equipment and property used for the purpose of performing Company Business. Worksites include any work location to which Employees have been assigned, including any offsite work location at which work is being performed.	
Drug(s)	A substance which: (i) has a physiological or psychological effect when ingested or otherwise introduced into the body; and/or (ii) is sold, used, procured, or possessed for non-medical purposes; and/or (iii) is restricted or controlled, and/or illegal to possess, cultivate or traffic pursuant to the Controlled Drugs and Substances Act, the Criminal Code of Canada, the Cannabis Act and/or any other applicable legislation or regulation. Drug(s) includes recreational cannabis but does not include Medications.	
Drug Paraphernalia	Any personal property and items that are associated the possession, cultivation, purchase, sale or use of any Drug.	
Failure to Test	Includes the failure to report directly for a Test, refusal to submit to a Test, or refusal to agree to disclosure of a Test result to the Company. A Failure to Test will also include an inability to provide sufficient quantities of a breath or urine or other substance to be tested without a valid medical explanation.	
Fit(ness) for Duty	The status of a person who is mentally and physically able to competently perform the duties of its position in a safe and efficient manner without limitation, including due to the influence of Alcohol, Drugs or Medications.	
Medication	Any substance, chemical or agent prescribed or recommended by a licensed health care professional to treat diagnosed medical conditions including over-the-counter medications.	
Reasonable Cause	Information established by the direct observation of an individual's conduct or other indicators, such as the physical appearance, smell associated with Alcohol or Drugs, attendance record or unexplained absences during work hours, circumstances surrounding an incident or near miss and the presence of Alcohol, Drugs or Drug Paraphernalia in the vicinity of the individual or the area where the individual worked.	
Substance Abuse Assessment (SAA)	An assessment conducted by a SAP to determine whether an individual needs assistance resolving an Alcohol or Drug dependency, problem or issue.	
Substance Abuse Professional (SAP)	A SAP is a licensed physician, a licensed or certified social worker, a licensed or certified psychologist, a licensed or certified employee assistance professional, or an Alcohol and Drug abuse counsellor that possess professional training and clinical experience in the assessment and treatment of substance abuse-related disorders and has an understanding of the safety implications of substance use.	
Supporting Procedures	Any procedures and similar governance documentation in furtherance of the Drug, Alcohol & Cannabis Policy, as may be adopted or amended from time to time, including the Drug & Alcohol Testing and Search Standard and Medication Framework.	

5. Requirements

5.1 Responsibilities

5.1.1 Worker Responsibilities

Worker responsibilities include:

- Reading, understanding and complying with this Policy and its Supporting Procedures;
- Reporting and remaining Fit for Duty while on Company Business and Company Premises, and when designated on-call;
- Assuming ownership of a Drug, Alcohol or Medication dependency by seeking professional assistance and making use of the resources and services provided by the Company or third party assistance providers;
- Seeking advice and following any recommended treatment or rehabilitation programs;
- Notifying a Supervisor or HR if it believes any Worker is not Fit for Duty due to the Drugs, Alcohol or Medication;
- Obtaining advice from a physician or other qualified medical professional regarding whether a
 Medication could affect its Fitness for Duty and promptly report any concerns in this respect to
 a Supervisor or HR;
- Fully co-operating with any investigation into a violation or potential violation of this Policy, including any request to participate in a Test;
- Reporting for Testing and cooperating to ensure integrity of the Testing process without tampering, adulterating or interfering (ex: masking agents, diluting, substituting samples or false representations);
- Not using Drugs or Alcohol (other than the medically necessary use of Medication) after being involved in or observing an Incident until the earlier of the following occurs:
 - (i) the Worker has been Tested, or
 - (ii) the Worker has been advised by the Company that it will not be Tested.
- Promptly refusing any work if not Fit for Duty and reporting the refusal to its Supervisor.

5.1.2 Supervisors Responsibilities

Supervisors' responsibilities include:

- Ensuring the safety of Workers and Worksites in all cases and at all times, including stopping work as required;
- Consulting with the Health, Safety and Security, Legal and Security departments as soon as possible following an Incident;
- Ensuring this Policy and its Supporting Procedures are communicated to Workers;
- Implementing this Policy and its Supporting Procedures;
- Identifying Worker behaviour, performance concerns and problems that may be linked to Drugs, Alcohol or Medications and notifying HR as appropriate;

- Ensuring that a Worker that is not Fit for Duty is safely removed from the Worksite (with the assistance of the Security department as appropriate) and that HR is notified and has arranged for appropriate assessments;
- Documenting a Workers refusal to report for work or to conduct work by reason of not being Fit for Duty;
- Following and implementing the Drug & Alcohol Testing and Search Standard and Medication Framework:
- Demonstrating leadership and supervision to ensure safe and healthy Worksites at all times;
- Assisting Workers to access appropriate resources for substance abuse issues in conjunction with HR; and
- Fully co-operating with any investigation into a violation or potential violation of this Policy, including any request to participate in a Test.

5.2 Prohibited Conduct

The following are prohibited while on Company Business or on Company Premises:

- Use, possession, cultivation, manufacture, storage, distribution, consumption, dispensation, trading, offering or sale of Alcohol, Drugs and Drug Paraphernalia except as permitted by this Policy;
- Possession, storage or use of Medications prescribed for another individual or the possession, storage or use of prescription Medications without being able to produce a personal prescription from a licensed treating physician;
- Possession, storage or use of Medications that have the potential to impact Fitness for Duty without prior approval of HR; and
- Travel to and attendance at a Worksite or otherwise working at a Worksite while not Fit for Duty.

5.3 Prevention, Assistance, Rehabilitation

The Company provides education and makes information available about health and safety risks associated with Drugs and Alcohol. Workers are encouraged to seek help through the Company's Employee Assistance Provider (available to Employees only), HR, a Supervisor, physician or other community or local assistance providers for a Drug or Alcohol problem that has the potential to affect Fitness for Duty.

Workers who may have an actual or potential Drug or Alcohol dependency that has the potential to affect Fitness for Duty must advise their Supervisor or HR immediately. Accommodation of an Employee's substance problem must be substantiated by medical documentation.

Accessing assistance or admitting a Drug or Alcohol problem does not eliminate the requirement to remain Fit for Duty. Testing and discipline may still be applicable in light of a request for assistance or self-disclosed substance problem.

If applicable, Workers must comply with any recommended treatment or after-care programs and may be required to participate in Testing prior to returning to a Worksite and periodically thereafter pursuant to a Return to Work Agreement.

In respect of Workers with ongoing Drug or Alcohol problems, and at the Company's discretion: (i) a medical work modification may be issued and the Worker may be assigned to alternate duties; (ii) the Worker may

be suspended or placed on leave pending a Substance Abuse Assessment (SAA) from a Substance Abuse Professional (SAP) and/or the completion of rehabilitation; or (iii) where a physician or other qualified professional advises that a Worker's Fitness for Duty is uncertain, the Company may remove and ban the individual from Company Premises.

5.4 Testing

In accordance with the Drug & Alcohol Testing and Search Standard, Testing may be conducted in the following circumstances:

- Pre-employment;
- Worksite access;
- Reasonable Cause;
- In the case of an Incident or High Potential Incident;
- Pursuant to a Return to Work Agreement.

Workers must report for and submit to Testing as required in accordance with this Policy and the Drug & Alcohol Testing and Search Standard and the Company will explain the basis for the Test.

5.5 Searches

The Company may conduct or arrange for searches the Drug & Alcohol Testing and Search Standard. In some circumstances, sniffer dogs, third parties and/or law enforcement agencies may be involved in the search.

5.6 Violations of this Policy

Violation of this Policy may result in discipline up to and including termination of engagement with the Company. The Company will conduct a reasonable internal review and/or investigation to inform any disciplinary decision.

Violations of this Policy include but are not limited to:

- A failure to comply with this Policy and/or Supporting Procedures;
- A positive Test; or
- A Failure to Test.

After a confirmed positive Test, an Employee may be referred to an SAP for an SAA. Failure to meet with an SAP or attend a scheduled SAA may be considered a violation of this Policy.

5.7 Return to Work Agreement

As reasonably determined by the Company, a Worker that violates this Policy or has a Drug or Alcohol problem, if allowed to continue working for the Company, may be subject to a Return to Work Agreement which could include but is not limited to the following conditions:

temporary removal/suspension from its position;

- adherence to a treatment and/or aftercare program;
- a negative return to work Test(s) and random, unannounced testing;
- adherence to any ongoing rehabilitation conditions or requirements; and
- no further Policy violations.

Failure to meet any of the conditions of a Return to Work Agreement may be grounds for discipline up to and including termination.

5.8 Company/Non-Company Events and On-Call Duty

The use of Drugs and Alcohol at any time is not encouraged by the Company. No Worker may:

- Attend a Worksite after consuming Drugs or Alcohol at a social event (Company sponsored or otherwise); or
- Consume Drugs or Alcohol while on-call, or report to work after having consumed Alcohol or Drugs while on-call.

5.8.1 Company Events

All Company sponsored events must be conducted in accordance with applicable law.

Alcohol

Subject to section 5.8, consumption of Alcohol at a Company sponsored event may be permitted, provided that:

- a) It has first been approved by the Senior Management of the hosting department(s);
- An accountable Employee for the event has been designated by Senior Management or Management that has primary responsibility to ensure the requirements of (c) below are implemented; and
- c) The event is responsibly managed consistent with the principles of this Policy, including but not limited to the following guidelines:
- Third party trained servers work at each event, ensure bars are attended at all times and/or supervise the use of untrained servers;
- All applicable licenses, permits or authorizations are obtained;
- Reasonable steps will be taken to avoid Incidents and prevent offensive, abusive or unsafe behaviour;
- Safe transportation will be encouraged and/or provided where applicable;
- As appropriate, law enforcement authorities will be contacted if an Incident or other negative event occurs;
- Responsible serving practices will be followed; and
- Food and non-alcoholic beverages will be available.

Recreational Cannabis

Possession and/or use of recreational cannabis and derivatives at any Company sponsored event is prohibited.

5.8.2 Non-Company Events

Subject to section 5.8, the provision or use of Alcohol and/or recreational cannabis and derivatives may be permitted at events not sponsored or organized by the Company as determined by the event organizers. Such events include but are not limited to:

- Group celebratory meals;
- · Golf tournaments, curling bonspiels and similar;
- Stampede functions;
- Industry conferences; and
- Sporting events.

5.9 Camps

The possession, storage or use of Drugs and Alcohol and Medications that have the potential to impact Fitness for Duty without prior approval of HR are prohibited in a Camp.

5.10 Confidentiality

The personal information associated with Drug, Alcohol or Medication and other information related to this Policy is sensitive and the will be kept reasonably confidential, which includes ensuring that access to such information is limited to individuals that have a need to know such information for legitimate business purposes. It is acknowledged that such information may need to be shared to address Fitness for Duty concerns, appropriate work accommodations and/or work re-entry efforts.

5.11 Review and Amendments

This Policy may be reviewed and amended as appropriate from time to time. Policy deviations and enhancements must be approved in accordance with the Governance Policy.