

Alcohol and Drug Policy

OBJECTIVE

Canam Group (hereinafter referred to as “**Canam**”) recognizes the importance of maintaining a healthy and safe work environment that complies with the various laws and regulations, and is committed to preserving the integrity of the members of its organization using every means at its disposal.

Canam and its personnel are fully aware of the repercussions that the use of alcohol, drugs or medication can have on employees’ health, safety, job performance and behaviour, and of the harm it can cause to the employer, the employees in question, their colleagues and their families. That’s why Canam has decided to adopt a zero-tolerance policy that aims to establish and standardize the prevention process, the follow-up and the guidelines for all personnel, and to set out Canam’s rules on using, possessing and dealing drugs, alcohol and medication at work.

SCOPE

This policy applies to all employees at Canam and at its subsidiaries working in Canada as well as to subcontractors carrying out work on behalf of the company.

ROLES AND RESPONSIBILITIES

Employees must take the necessary measures to deliver a consistent and safe job performance. Employees must inform their employer if there is reason to believe that they might be impaired for any reason, including due to using legal drugs, drugs prescribed by a physician or over-the-counter drugs. Problems will be considered on a case-by-case basis. In this respect, employees are responsible for learning about the potential effects of substances on their ability or fitness to work.

Employees who have substance abuse problems are responsible for finding a solution. Employees who find that a colleague or subcontractor has violated this policy must immediately notify their immediate supervisor.

All supervisors must take the necessary measures to protect their employees’ health, safety and physical and psychological integrity.

Supervisors who have reasonable grounds to believe that an employee is impaired must prohibit them from carrying out any work if there is a safety risk, or take the appropriate measures to quickly remove the employee from duty. In such situations, the supervisors must immediately contact Human Resources.

The Human Resources Department is in charge of training the various stakeholders identified in this policy, of releasing the policy to all Canam personnel and of enforcing the policy through supervisors. The department is also in charge of the Employee Assistance Program (EAP) and makes sure to refer employees with substance abuse problems that can cause impairment.

DEFINITIONS

1. Alcohol: Any beverage or substance that contains any amount of alcohol.
2. Drug: Any substance that, when taken, can affect the way an individual thinks, feels or acts, be harmful to them or interfere with their ability to consistently and safely carry out their work. May also refer to medication.
3. Medication: Substance or composition with curative or preventive properties, especially regarding illnesses, injuries and allergies, or that can be administered to establish a medical diagnosis. There will be no distinction between prescription drugs and over-the-counter drugs.
4. Employer: Canam or one of its subsidiaries.

5. Employee: Refers to any regular, part-time or seasonal worker, any worker appointed for a specific period and any temporary worker, whether they are unionized or not.
6. Supervisor: Any employee designated as such by Canam.
7. Subcontractor: Any company or person that provides services to Canam or on its behalf and that is not on the company payroll.
8. Driver: Any person who operates a commercial vehicle on behalf of Canam.
9. Impaired: Having reduced intellectual or physical capacities, reflected in symptoms such as decreased judgment, attention, vigilance, memory, perception or physical coordination.
10. Workplace: Includes any location where work is carried out for the employer, including the land and properties owned by the employer.

RESTRICTIONS

1. Coming to work while impaired is prohibited.
2. Possessing, using, distributing, offering, soliciting, transferring, selling and providing any drugs, alcohol or impairing medication is prohibited at all times at the workplace and during work hours.

MANAGEMENT RIGHT

1. The employer is responsible for assessing workers' capacity to safely carry out their work. It has a right to intervene and take measures that it deems appropriate when there is reasonable doubt that an employee has violated this policy—more specifically, when there is reasonable doubt that the employee is impaired or when there is reasonable doubt as to their ability to deliver a consistent and safe job performance. In such cases, the employer will proceed as follows:
 - a) The immediate supervisor or any other supervisor must immediately remove the employee from duty.
 - b) The immediate supervisor must immediately inform the employee of their decision, based on their observations.
 - c) The employer must ensure that the employee does not operate a vehicle and must take the necessary steps to ensure that the employee returns home (or to the destination of their choice) safely.

SOCIAL OR SPECIAL ACTIVITIES

1. Subject to the prior authorization of the employer's management, moderate alcohol consumption may be tolerated and permitted as part of a social or special activity taking place in the workplace or on the premises of an activity organized by Canam.

The consumption of alcohol in these circumstances does not exempt the employee from complying with other employer policies and regulations, as well as laws and regulations in effect. Employees must also ensure that they consume responsibly and conduct themselves in a safe and professional manner. With any consumption of alcohol, even moderate, the employee may not at any time access or be in an area of the workplace (plant, shipping area, etc.) that poses a risk to his or her health or safety.

The use of drugs in any form is prohibited at all times.

DRUG AND ALCOHOL TESTING

1. The employer reserves the right to have drug, alcohol or medication testing performed, as soon as it is feasible to do so, on reasonable grounds such as:

- a) If evidence reasonably leads to believe that the employee is impaired. Without limiting the foregoing, an employee's unusual or eccentric behaviour, confused state or drowsiness, the smell of alcohol or drugs, red or glassy eyes, highly dilated pupils, slurred speech, an unusual walk and difficulty walking are symptoms that can lead the employer to believe that the employee is impaired.
- b) When circumstances reasonably lead to believe that an employee involved in an accident or who narrowly avoided an accident is or was impaired.
- c) When it has reason to believe that someone violated this policy.
- d) When an employee has returned to work following a policy violation, as part of a last-chance agreement, or a rehabilitation or monitoring program implemented for employees returning to duty following a treatment for alcoholism and/or drug addiction.

It is up to the employer to choose a provider to perform the testing.

Employees in transportation who transport goods in the United States must comply with US regulations regarding drugs and alcohol.

Inspections and searches: The employer must take the necessary measures to protect its employees. It may conduct inspections or searches on reasonable grounds. In such cases, the scope of the inspections or searches will be limited to what is necessary to find the substances in question or to prove that this policy has been violated.

CONSEQUENCES OF POLICY VIOLATION

1. Employees who violate one of the policy's provisions will face the appropriate administrative or disciplinary measures, which may include dismissal for a first offence.
2. Any employee who comes to work impaired by alcohol or drugs may not work, must leave the workplace and could face administrative and disciplinary measures. The employee may have to undergo drug and/or alcohol testing as a condition to return to work.
3. Any employee who refuses to undergo testing or a search could face administrative and/or disciplinary measures deemed appropriate according to the circumstances, including dismissal.

SUBCONTRACTORS

All subcontractors working in locations belonging to or operated by Canam must comply with this policy. If the policy is violated, the company reserves the right to expel any subcontractor or employee from the site and to immediately put an end to any agreement between Canam and the subcontractor.

CONFIDENTIALITY

This policy is administered confidentially, subject to all circumstances that justify the necessary disclosure of certain information to third parties.



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