



Substance Abuse Policy

Silver Tide Holdings Ltd. is committed to the safety and productivity of all operations on behalf of their personnel, customers and the communities in and / or through which they operate. The company recognizes that the use of illicit drugs and / or the misuse of alcohol and medications can limit a person's ability to properly do their job and can have a serious, negative impact on the health and safety of themselves and others. The company goal is to provide a program that emphasizes our strong commitment to the health and safety of all personnel, as well as the safety of the general public.

Recent statistics show that employees who are substance abusers have:

- ❖ Seven times the number of injury accidents;
- ❖ Eight times the number of vehicle accidents
- ❖ Higher absenteeism;
- ❖ Lower productivity;
- ❖ Greater employee theft;
- ❖ Higher incidents of damage to equipment.

Such employees may cause our company irreparable financial loss through injury, accident, lawsuits, vicarious claims, and contractual obligations.

This policy applies to all personnel engaged in business on behalf of **Silver Tide Holdings Ltd.** Violation of the policy is grounds for disciplinary action. As a condition of employment, all personnel are required to read, sign and comply with all parts of this policy. As well, this policy applies to lease operators and / or contractors, including their personnel, while providing services to **Silver Tide Holdings Ltd.** Any contravention will be considered a breach of contract. All personnel should be aware that this policy and the procedures contained do not, in any way, constitute a contract or contractual agreement of any kind whatsoever.

Employees found to be using alcohol / drugs while at work or less than four hours prior to work will be disciplined. First offence is consultation with Operations and Management regarding disciplinary action including suspension with the possibility of rehabilitation. Any subsequent offence is cause for immediate dismissal. Supervisors having actual knowledge that the employee is under the influence of alcohol / drugs shall not permit the employee to get behind the wheel or operate any company equipment.

Employees are responsible for letting management know if they are taking prescription drugs that may impede their ability to work safely.

Employees who function on a 24-hour call out basis and have not booked time off are reminded that refusing a call out due to consumption of alcohol/drugs may be considered an abuse of the policy. Frequency of refusal of call outs for this reason will indicate a substance abuse concern and will be deemed contrary to policy.

Management, Supervisors, and all Employees at each level and location are responsible for monitoring and reporting incidents of Substance Abuse on the job.



Testing Options:

Post-accident: drug and alcohol testing of an employee in a safety sensitive position within a designated time period after an accident that involves a fatality, disabling injury or significant incident or near miss. Tests for drug will be conducted within 32 hours of an accident. Alcohol testing will occur within 2 hours of an accident with attempts to test for up to 8 hours. If unable to test the reason will be documented.

Reasonable cause: an employee in a safety sensitive position will be tested for alcohol and / or drug use where a company supervisor or other official, who is trained to identify drug and alcohol use by an employee, makes observations which form a reasonable basis for suspecting that the employee is in breach of this policy. Such observations must be documented, specific, clearly stated observations concerning the appearance, speech or body odors of the employee. The observations may include indications of the chronic and withdrawal effects of drug and alcohol use.

Observations, which may lead to reasonable cause testing, are not limited to, but may include:

- ❖ Odor of alcoholic beverage on breath;
- ❖ Slurred speech
- ❖ Glassy eyes
- ❖ Unsteadiness in walking, standing;
- ❖ Flushed fact;
- ❖ Disoriented and/or drowsy;
- ❖ Accidents or injuries;
- ❖ Repeated errors in job performance;
- ❖ Excessive absenteeism or lateness.

Pre-access: testing of employees in safety sensitive positions to gain and / or maintain access to company or client sites where safety is a bona fide occupational requirement.

Return to duty: testing of an employee who has engaged in prohibited conduct and is returning to work after an assessment by a Substance Abuse Professional (SAP).

Follow-up: on an unannounced basis for at least one year on return after a Substance Abuse Professional (SAP) assessment identifies the need to resolve a problem with alcohol or drug abuse.

Collections of Specimens and Analysis:

A designated drug testing company will collect and process urine specimens for drug testing as required. All testing must meet or exceed the guidelines and standards of the Substance Abuse and Mental Health Services Administration, which is the certifying agency for forensic urine drug testing laboratories in Canada and the United States. Drug testing refers to marijuana, cocaine, amphetamines, opiates and phencyclidine. See Appendix "A"

Alcohol screen testing will be with an approved saliva tester or breath test. All alcohol screening tests at .02 or higher will be confirmed with an approved Evidential Breath Alcohol Testing Device

Following proper chain of custody procedures an accredited laboratory will perform required testing with test results forwarded to a Medical Review Officer (MRO).



Prohibitions:

Alcohol Use

Alcohol concentration: No employee shall report for duty or remain on duty requiring the performance of safety sensitive functions while having a confirmed alcohol concentration of 0.02 or greater. No supervisor having actual knowledge that an employee has a confirmed alcohol concentration of 0.02 or greater shall permit the employee to perform or continue to perform safety sensitive functions.

On duty use: No employee shall use alcohol while performing safety sensitive functions. No supervisor having actual knowledge that an employee has used alcohol while performing safety sensitive functions shall permit an employee to perform or continue to perform safety sensitive functions.

Pre-duty use: No employee shall perform safety sensitive functions after using alcohol. No supervisor having actual knowledge that an employee has used alcohol within four hours shall permit an employee to perform or continue to perform safety sensitive functions.

Use following an accident: NO employee required to take a post accident alcohol test shall consume alcohol for eight hours following the accident, or until he / she undergoes a post accident alcohol test, whichever occurs first.

Drug Use

No employee shall report for duty or remain on duty requiring the performance of safety sensitive functions when the employee uses any drug, except when the use is pursuant to the instructions of a licensed medical practitioner who had advised the employee that the substance will not adversely affect the employee's ability to work safely at the job site. If a licensed medical practitioner advises the employee that the substance will affect the employee's ability to work in a safety sensitive position; the employee will notify his / her immediate supervisor. The supervisor will advise senior management of the circumstances.

Senior management shall ensure that the employee is removed from safety sensitive duties and accommodated to meet safety concerns. Accommodation may include work restrictions, modified duties, sick or disability leave.

No employee will intentionally misuse prescription or over the counter medications in such a manner as to render themselves unfit to safely perform their duties.

Refusal to Test

No employee shall refuse to submit to a post accident, reasonable cause, pre-access, and return to work or follow-up alcohol or drug test. No supervisor shall permit an employee who refuses to submit for required testing to perform or continue to perform safety sensitive functions. An employee who refuses to submit to a required test, tampers or attempts to tamper with a test sample or obstructs the testing process will be considered to have violated this policy. Positive test procedures will apply.



Fitness for work/use of drugs and alcohol

Possession, use or offering for sale of alcohol, drugs or drug paraphernalia on company or client sites or company vehicles is prohibited. Use of alcohol for social functions or when it relates to company business is permitted when approved by senior management who will ensure that the use does not contravene the intent of our policy.

Fitness for duty standards requires that an employee be capable of performing work functions in a safe and efficient manner.

Positive Test Procedures:

Potential employees who are positive on pre-employment drug screening tests will not be offered employment. An applicant who was positive on the pre-employment drug test will be encouraged to seek assistance from a Substance Abuse Professional and to re-apply for available positions when they can meet the company requirements.

Employees who are positive on a drug test as verified by the MRO will be:

- removed from duty
- suspended without pay

Employees with a confirmed alcohol concentration of .02 to .039 will be removed from duty immediately and will not be allowed to return to work until the following shift. The employee may be subject to corrective disciplinary action.

Employees having a confirmed alcohol concentration of .04 or greater will be removed from duty / suspended without pay.

Employees removed from duty/suspended having a positive drug test verified by an MRO and / or confirmed alcohol concentration of .04 or greater will be required to attend a meeting with senior management. Each case will be reviewed and written correspondence of the resources available in evaluating and resolving problems associated with the misuse of alcohol and/or drugs, including the names, addresses, and telephone numbers of Substance Abuse Professionals.

Where practical management will endeavor to meet or contact the employee the next working day and direction will be provided regarding the suspension and return to work choices.

Any employee who was suspended from duty having a positive drug test result verified by an MRO and / or a confirmed alcohol concentration of .04 or greater shall be evaluated by a Substance Abuse Professional who shall determine what assistance, if any, the employee needs in resolving substance abuse issues.

In order for this policy to be effective in ensuring that company employees will perform their safety sensitive functions unimpaired by alcohol or drugs, the provisions of this policy must be enforced. Accordingly, where an employee violates any provision(s) of this policy, the employee may be subject to corrective disciplinary action, as appropriate, up to and including removal from a client site and/or discharge.



Return to Work after a Positive Test:

An employee cannot be returned to safety sensitive duties until he / she has been evaluated by a Substance Abuse Professional, complied with recommendations, and has a negative result on a return to duty test and / or a breath alcohol concentration less than .02. The employee must provide a written report from the SAP verifying the evaluation and any required treatment or provide a release document for the required information.

Follow up testing will be conducted to monitor the returning employee for no less than one year. The frequency of testing will be determined by the company in consultation with the MRO and/or

SAP and will be designed to assist the employee in remaining alcohol and / or drug free at the work site.

Confidentiality and Record Keeping:

All drug test results are confidential and are released by the MRO to the designated company representative (DCR) or alternate. Alcohol test results are confidential and released by the testing company to the DCR or alternate. The DCR or alternate may release relevant information to company decision makers as required. Confidential information from a SAP will be handled in a similar manner.

All records will be maintained in a locked and secure manner. Records will be kept separate from personnel files. Negative test results will be maintained for no less than one year with positive test results and SAP assessments maintained for a five-year period.

Definitions:

Alcohol: the intoxicating agent in beverage alcohol, ethyl alcohol or other low molecular weight alcohols including methyl or isopropyl alcohol.

Drug: any substance other than food which is taken to change the way the body or mind functions. Drug testing refers to marijuana, cocaine, opiates, phencyclidine and amphetamines with cutoff levels as per the Substance Abuse and Mental Health Services Administration.

The laboratory will use the cutoff concentration displayed in the following table for initial and confirmation drug tests. All cutoff concentrations are expressed in nanograms per milliliter (ng/ml).



Results of a breath alcohol analysis are expressed in terms of weight to volume, weight of alcohol (expressed in grams) per volume of breath (210 liters). Evidential breath alcohol testing devices screen at the .020 levels.

Drug or Metabolite	Screening Level	Confirmation Level
1. Marijuana metabolites (1) Delta-9-Tetrahydrocannabinol-9-carboxylic acid (THC)	50	15
2. Cocaine metabolites (Benzoyllecgonine)	300	150
3. Phencyclidine (PCP)	25	25
4. Amphetamines	1000	500
(i). Methamphetamine		500 (Specimen must also contain amphetamine at a concentration of greater than or equal to 200ng/ml)
6. Opiate Metabolites	2000	
(i). Codeine		2000
(ii) Morphine		2000
(iii) 6-acetylmorphine (6-am)		10 (test for 6-AM in the specimen. Conduct test only when specimen contains morphine at a concentration greater or equal to 2000 ng/ml)

Significant incident: involving a fatality, disabling injury, significant property damage or an event or near miss that could have had potential serious consequences.

Substance Abuse Professional (SAP): A licensed physician or a licensed/certified psychologist, social worker, employee assistance professional or an addition counselor. All must have knowledge of a clinical experience in the diagnosis and treatment of alcohol, drugs and related disorders.



Medical Review Officer (MRO): The MRO is a licensed physician responsible for receiving laboratory results generated by an employer's drug testing program. They have knowledge of substance abuse disorders and appropriate medical training to interpret and evaluate an individual's confirmed positive test result together with his or her medical history and any other relevant bio medical information.

Safety sensitive position / function: where an individual has a key and direct role in an operation where safety is a bona fide occupation required at the job, in that safety is necessary to assure the efficient and economical performance at the job without endangering the employee, their co-worker or the general public. Includes employees where there is not direct or limited supervision available to provide frequent operational checks.

Supervisor training: Shall include the physical, behavioral speech and performance indicators of probable alcohol or drug misuse.

Collector: Non medical and medical personnel contracted by an agency who have received training in collecting urine samples in accordance with guidelines that would be acceptable to the regulatory agencies.

Chain of Custody: the process of documenting the handling of a specimen from the time a donor gives the specimen to the collector, during the testing at the laboratory, and until the results are reported by laboratory.

Accredited laboratory: meets guidelines and standards of the Substance Abuse and Mental Health Services Administration.

Evidential Breath Testing Device (EBT): capable of measuring the alcohol content of deep lung breath samples with sufficient accuracy for evidential purposes. The EBT must be on the conforming products list as per the U.S. National Highway Traffic Safety Administration.

Breath Alcohol Technician (BAT): an individual trained and certified to conduct breath alcohol testing utilizing an EBT.

Alcohol concentration: the alcohol in a volume of breath expressed in terms of grams of alcohol per 210 liters of breath.

Standards:

Designated Drug Testing Company refers to: Any qualified medical laboratory used by **Silver Tide Holdings Ltd.**

Drug testing procedures: will follow the guidelines and standards of the Substance Abuse and Mental Health Services Administration. All drug tests are 5 panes for marijuana, cocaine, opiates, amphetamines and phencyclidine. A 5-part chain of custody form with a split specimen collection will be utilized for all testing.



Alcohol testing procedures: will follow the guidelines and standards of the Substance Abuse and Mental Health Services Administration. An intoximeter RBT IV's will be utilized when testing for the presence of alcohol. The RBT IV's are in the Criminal Code of Canada as an approved testing device. Confirmation tests are conducted on all screening test results of .02 or higher. The employer-designated representative is immediately contacted and advised of any confirmed results at the .02 or higher level. Three part-testing forms are utilized with employees receiving a certificate immediately following a test. Logbooks are maintained for each individual testing device for a five-year period. Training records are maintained for a minimum of 2-year period.

Contractual Obligations:

Silver Tide Holdings Ltd. may be required by contract to adjust the testing frequency and / or categories based on client requirements. **Silver Tide Holdings Ltd.** will conduct testing as required to meet our obligations to safety and we will accommodate employees who may have issues with substance abuse.

Program Cost:

Silver Tide Holdings Ltd. will not be responsible to pay for costs associated with this alcohol and / or drug testing program except "Return to Duty", "Follow-up" testing.

These systems and protocols are designed to ensure accuracy, reliability and confidentiality of the results.

Employee Assistance Program:

It is the responsibility of each person to seek professional assistance before performance problems leads to disciplinary action. Personnel wishing to seek professional assistance without involving the company are encouraged to contact agencies such as AADAC (Alberta Alcohol and Drug Abuse Commission), their personal physician or clergy.

Silver Tide Holdings Ltd. maintains an assistance referral program that provides help and information to personnel who suffer from substance abuse and other personal and / or emotional problems.

Any personnel who may have a substance abuse problem and would like to take advantage of this program should contact management. **Silver Tide Holdings Ltd.** will not cover the cost of an assessment or for recommended counseling sessions for voluntary referrals.

Employee Responsibilities:

All personnel of **Silver Tide Holdings Ltd.** are required to read and comply with all parts of this policy. Understanding, accepting and complying with the "Substance Abuse Program" is a condition of employment with the company.

This "Substance Abuse Program: does not alter or pre-empt any other current policies of **Silver Tide Holdings Ltd.**