

## 17.1 Corporate Alcohol and Drug Policy

### 17.1.1 Alcohol & Drug Policy and Related Processes

#### 1.0 FOREWORD

Our Alcohol & Drug Policy and Related Process follows the standards referenced in the COAA Canadian Model for Providing a Safe Workplace – Alcohol and Drug Guidelines and Work Rule – Version 5.0. This policy and process lays out our expectations, roles, responsibilities for all of the NCSG companies and affiliates across North America as endorsed by Executive Management.



Vice President – HSE, Technical Training & Compliance

January 1, 2016

Dated

#### 2.0 PURPOSE

NCSG Crane & Heavy Haul Services and its affiliated companies (referred to as NCSG) are committed to being industry leaders in Health, Safety and Environmental practices, to maintaining a safe and healthy workplace, and to protecting the environment. Excellence in Health, Safety and Environmental practices is vital to the well being of all people everywhere and essential to all aspects of our business. All employees and sub-contractors share in the responsibility to ensure that our worksites are safe and environmentally responsible.

The use of illicit drugs and the inappropriate use of alcohol and medications can adversely affect job performance, productivity, the work environment and the well being of employees. It can also place the integrity and safety of company property and operations at risk, impacting the individual, co-workers, customers, contractors, suppliers, and the public.

Consistent with our Health, Safety and Environmental Policy, the Company has implemented this Alcohol and Drug Program to eliminate any negative effects of alcohol and other drug use in our workplace.

Note: NCSG's Alcohol and Drug policy operates in the spirit of the Alcohol and Drug Guidelines and Work Rule of the Construction Owners Association of Alberta (COAA) and is subject to change based on amendments to the same.

#### 3.0 SCOPE AND APPLICATION

The following provisions apply to all employees while they are engaged in company business, working on company premises or worksites, and operating company vehicles and equipment. All employees are responsible for their own and others' health, safety and environmental performance and are expected to take appropriate action where they believe there is a safety risk or potential violation. Any violation of this Program will be considered a fundamental breach of the employment contract and employees will be subject to disciplinary action up to and including termination. Failure of supervisors to meet their additional responsibilities under this Program will be grounds for disciplinary action.

All contractors will be advised of the applicable provisions of this Alcohol and Drug Policy, and will be expected to enforce these requirements for their employees, sub-contractors and agents. Any contravention will be considered a breach of their contract.

Details on the expectations around alcohol and drug use and possession, the procedures for implementation, and definitions of terms are found in the following sections of the Program. Education, awareness and supervisor training programs support it. This Program is subject to ongoing review and evaluation, and modifications will be made as deemed necessary to respond to current circumstances and evolving needs.

#### 4.0 DEFINITIONS

##### **Company Business**

Refers to all business activities undertaken by employees and contract workers in the course of the company's operations, whether conducted on or off company premises or worksites. It includes those situations when an individual is representing, or could reasonably be perceived as representing the company in the performance of duties.

##### **Company Premises**

Includes but is not necessarily restricted to all land, facilities, mobile equipment and vehicles owned, leased or otherwise directly controlled by NCSG.

##### **Company Worksite**

Includes any site or location where an NCSG or NCSG employee has been assigned to work.

##### **Contractor**

Refers to any person or entity, including their employees, that has been contracted, sub-contracted, or otherwise engaged to provide services to the company on a fee for service basis.

##### **Drug**

Means any substance, including but not limited to alcohol, illicit drugs, medications or other substances, the use of which has the potential to change or adversely affect the way a person thinks, feels or acts. For purposes of this

Program, drugs of concern are those that inhibit a worker's ability to perform his or her job safely and productively.

- Alcohol means the intoxicating agent in beverage alcohol, ethyl alcohol, or other low molecular weight alcohols including methyl and isopropyl.
- Beverage Alcohol refers to beer, wine and distilled spirits.
- Illicit drug means any drug or substance which is not legally obtainable and whose use, sale, possession, purchase or transfer is restricted or prohibited by law (e.g. street drugs such as marijuana, cocaine, and methamphetamine).
- Medication refers to a drug obtained legally, either over-the-counter or through a doctor's prescription.

### **Drug Paraphernalia**

Any personal property which is associated with the use of any drug, substance, chemical or agent, including any product or device that may be used to attempt to tamper with a testing sample.

### **Employee**

Includes all regular full time, part time, temporary, and casual employees on the NCSG payroll or on the payroll of one of NCSG's subsidiaries.

### **Fitness for Work**

In the context of this Program means being able to safely and acceptably perform assigned duties without any limitations due to the use or after-effects of alcohol, illicit drugs, medications or other substances.

### **Risk Sensitive Operating Location**

For purposes of this Policy, all NCSG operating locations are considered risk sensitive except the Corporate office (excluding the attached shop and yard). All client sites are to be considered risk sensitive, as is any driving operation on behalf of NCSG.

### **Significant Incident**

Any incident that results in, or may reasonably have resulted in, any of the following:

- An injury that results in an employee or contract worker:
- Fatality;
- Lost-time injury; or
- Medical aid injury (BLS Classification Guidelines).
- An injury to a customer, member of public or other 3rd party not directly associated with, but injured as a result of, company business;
- An incident that is reportable under Provincial, State or Federal legislation;
- Significant loss or damage to property, equipment or vehicles;
- Any other significant work-related incident or a near miss considered to have had significant potential for more serious consequences.

### **Supervisor**

The person who directs the work of others and may, depending on the nature of NCSG's structure, include but not limited to; foreman, general foreman, supervisor, superintendent and team leader.

### **Hiring and Employment - Testing**

NCSG Crane & Heavy Haul Services and its affiliated companies (NCSG) maintain the following conditions for employment or hire with regards to Alcohol and Drug:

- In accordance with Section 4.8 of the COAA – Alcohol and Drug Guidelines and Work Rule, all new hires are required to submit to and test negative to an Alcohol and Drug Test prior to being hired with NCSG.
- In accordance with Section 3 of the COAA – Alcohol and Drug Guidelines and Work Rule, the concentration limits for said testing are defined and adopted in full. See appendix E of this policy.
- Appendix C of this Policy specifically outlines the Alcohol and Drug Testing process.
- All testing is conducted at a certified laboratory and testing procedures meet or exceed the requirements of the COAA – Alcohol and Drug Guidelines and Work Rule, in accordance where applicable with those parts of the United States Department of Transportation Workplace Drug and Alcohol Testing Programs and certified by the United States Department of Health and Human Services as an instrumented initial test facility.
- Continuity of Employment, any lapse in employment for any reason exceeding 30 days, submission to and test negative to an Alcohol and Drug Test prior to the employment relationship continuing is mandatory.
- Any individual who may have tested positive as described within and is allowed to return to work by arrangements as described within, must submit to and test negative to an Alcohol and Drug Test prior to the resumption of work.
- All person(s) who have violated this program will remain ineligible for rehire for a minimum of 365 days from the date of violation. Prior to consideration for rehire, the person(s) must show evidence of a an approved rehab program, agree in writing to a last chance agreement with enhanced testing and must have the approval of the Vice President of HS&E.

## **5.0 EXPECTATIONS**

To minimize the risk of unsafe and unsatisfactory performance due to the use of alcohol or other drugs, employees are expected to comply with the following requirements, and to report fit for work and remain so throughout their workday or shift. The following requirements have been set for any activity undertaken while on Company business, premises or worksites or while operating a Company vehicle or equipment.

## 5.1 Illicit Drugs

The following are prohibited:

- The use, possession, cultivation, manufacture, distribution, offering or sale of illicit drugs or illicit drug paraphernalia;
- Reporting for or being at work under the influence of illicit drugs; and
- A positive test result for illicit drugs as determined through the testing program.

## 5.2 Alcohol

The use, possession, distribution, offering or sale of beverage alcohol is prohibited when on company premises and worksites with the exception noted below. In addition, employees covered by this Program are expected to use alcohol responsibly in those situations it is permitted and to report and remain fit for work in compliance with this Program. Employees cannot:

- Have an alcohol test result of .04 Blood Alcohol Concentration (“BAC”) or greater;
- Transport or store beverage alcohol in a vehicle owned, assigned, or contracted by NCSG for NCSG business purposes; and
- Consume alcohol after an incident until tested or advised by the Company that a test is not required.

**Risk Sensitive Operating Locations:** In addition, because of the higher risk involved in most of our operations, anyone assigned to work in a risk sensitive operating location, or who is temporarily working in the location (including business visits) must comply with the following. Employees:

- Must not report for work or remain at work under the influence of alcohol from any source;
- Can not consume any product containing alcohol (including beverage alcohol) when at work including during meals or breaks; and
- Will be removed from the workplace at least until their next shift if they have an alcohol test result of .02-.039 BAC.

Employees at these locations may consume alcohol after the work day, for example, when on travel status, at a training event or seminar, or in any other similar business-related situation provided the formal business is completed, they use alcohol responsibly in compliance with the requirements set out above, and that they are not reporting for or returning to work. Anyone who attends a NCSG social event and consumes alcohol must not be returning to or reporting for work after the event.

**Exceptions to Rule on Possession:** Possession of alcohol is strictly prohibited on company premises, with the exception of factory sealed containers which may be stored in personal vehicles parked on Company premises, provided the alcohol is locked in the trunk of the vehicle or otherwise appropriately secured.

Alcohol received as a gift may be temporarily stored on Company premises, including in a vehicle, but must remain sealed and be removed at the earliest opportunity.

## 5.3 Social Situations

In the case of any NCSG social event, appropriate regard will be taken for the safety and well being of the individuals present and the community. Responsible alcohol use is permitted at off-site social functions with the prior approval of the appropriate Vice President, provided the expectations around alcohol use are observed (e.g. no use by someone at a risk sensitive location if returning to work), that alcohol consumption is controlled so there is no inappropriate behavior at the function or potential for impaired driving afterwards, and alternative transportation arrangements are made available. Additional guidelines are attached in Appendix A.

Consistent with the above, if alcohol is made available to NCSG guests in the course of conducting business (e.g. restaurant meetings), employees are expected to use judgment and be responsible in hosting others.

## 5.4 Medications

It is expected that prescribed and over-the-counter medications will be used responsibly in accordance with the physician’s or pharmacist’s instructions. Medications of concern are those that may inhibit an employee’s ability to perform their job safely and productively. A guideline on medications is attached in Appendix B. The following are prohibited while on company business, premises and worksites:

- The intentional misuse of medications (e.g. using the medication not as it has been prescribed, using someone else’s prescription medication, combining medication and alcohol use against direction); and
- The unauthorized possession of prescribed medications without a legally obtained prescription, and unauthorized distribution, offering or sale of prescription medications (trafficking).

Employees are expected to:

- Investigate (through their doctor or pharmacist) whether a medication they are using will affect their ability to do their job safely; and
- Act responsibly and use a safe alternative medication choice when available (e.g. non-drowsy); however
- If the medication they are using will affect their ability to operate safely, advise their supervisor or designate of any need for modified duties.

In this situation, a medical work modification may be issued, and the employee may be assigned to alternate duties if available and at the discretion of the Company. The Company reserves the right through the Program Administrator to confirm the nature and duration of modified work requirements with the treating physician, without any breach in medical confidentiality.

## 5.5 Unscheduled Call in

If unexpected circumstances arise where an employee is requested to perform unscheduled services while under the influence of alcohol or medications that could impact safe operations, it is the responsibility of the employee to decline the call.

## 6.0 ROLES AND RESPONSIBILITIES

### 6.1 Employees

Employees are expected to perform their job in a safe manner and in all ways consistent with established company practices. In addition, it is expected that everyone will:

- Read and understand this Program and their responsibilities under it;
- Report fit for work for any and all scheduled work and remain fit for work while on company business, premises and worksites;
- Seek advice and follow appropriate treatment if they have a current or emerging problem, and follow recommended monitoring programs after attending treatment;
- Co-operate with any work modification related to safety concerns;
- Intervene as appropriate to encourage a co-worker to access assistance before an alcohol or drug problem impacts performance or safety; and
- Co-operate with an investigation into a violation of this Program, including any requirement for testing.

An employee or contractor shall not;

- a) Use, possess or offer for sale alcohol and drugs or any product or device that may be used to attempt to tamper with any sample for a drug and alcohol test while on company property, workplace or while representing the company in any fashion,
- b) Report to work or work
  - a. With an alcohol level equal to or in excess of 0.040 grams per 210 litres of breath,
  - b. With a drug level for the drugs set out Appendix E equal to or in excess of the concentrations indicated, or
  - c. While unfit for work on account of the use of a prescription or non-prescription drug,
- c) Refuse to
  - a. Comply with a request made by a representative of the company who has reasonable grounds to believe an employee or contractor is in contravention of this Policy, or
  - b. Comply with a request to submit to an Alcohol and Drug test as a result of observation of employee conduct that is believed that the employee is or may be unable to work in a safe manner because of the use of alcohol and drugs.
  - c. Comply with a request to submit to an Alcohol and Drug test as a result of an incident or near miss, random testing (as defined in 4.6 of the COAA Canadian model), a condition or request of a client for Site Access testing, or where required by client/collective agreement or condition to provide oral fluid testing/urine sample and/or observed collection.

Because all individuals working for NCSG have a shared responsibility for workplace safety, employees are encouraged to look out for other employees, contractor workers or visitors in terms of fitness for work. They are expected to take appropriate action to ensure no individual remains in an unfit condition on Company premises or a worksite such that they may endanger themselves or others, by ensuring their supervisor, Health, Safety and Environment, Human Resources, their Union Representative or any other appropriate individual is advised of the situation.

### 6.2 Supervisors will be responsible for:

- Ongoing performance management to ensure safe operations and effectiveness of the policy;
- Guiding employees who seek assistance for a personal problem to appropriate resources (e.g. Human Resources, Corporate Health, Safety and Environment, or other community resources) while maintaining confidentiality under the circumstances;
- Making arrangements for a Substance Abuse Professional assessment through the Program Administrator if an employee says they have a problem with alcohol or other drugs;
- Taking appropriate steps to investigate any violation of this Program;
- Making referrals for an alcohol and drug test in a post incident or reasonable cause situation as and when required to do so under this Program;
- Monitoring and ensuring the compliance of contract workers.
- Completing required training on; recognizing impairment in the workplace, how to properly deal with an impairment situation in the workplace, signs and symptoms of impairment, procedures to follow when an employee or contractor is suspected of being impaired or having a substance abuse problem.

### 6.3 Program Administrator (VP HR and VP HSE) will be responsible for:

- Consistent administration of this Program;
- Resolution of any questions of interpretation;
- Supporting supervisors in meeting their responsibilities;
- Coordinating delivery of employee education and supervisor training programs, including refreshers as required;
- Making arrangements for a Substance Abuse Professional assessment as required;
- Overseeing implementation of modified work, return to work agreements, or similar accommodation situations; and

- Ongoing management of the alcohol and drug testing program.

#### **6.4 Management will be responsible for:**

- Ensuring all employees and contractors have been trained on this policy prior to any work in the field. Ensuring Supervisors have completed additional training.
- In addition to the same responsibilities as Supervisors, ensuring Supervisors are implementing and maintaining the requirements of this policy.
- Actively involved in the review and content feedback of this program on an annual basis.

### **7.0 METHOD**

#### **7.1 Prevention, Assistance, Rehabilitation, Aftercare**

##### **Prevention**

This Program stresses the importance of prevention and early identification of potential problem situations. The company will make information available on health and safety hazards, recognizing related performance problems, and the process to access assistance.

Employees are encouraged to access the company Employee Assistance Provider (EAP), their personal physician, or appropriate community services for help with an alcohol or drug problem, or any other problem that may be affecting work performance.

##### **Assessment/Rehabilitation**

NCSG recognizes that alcohol and drug dependencies are treatable illnesses and that early intervention greatly improves the probability of a lasting recovery. Individuals who suspect they have a substance dependency or emerging alcohol or drug problem are expected to seek advice and to follow appropriate treatment promptly before job performance is affected or violations of this Program occur.

Employees who come forward voluntarily for help with an alcohol or drug problem will be referred to a Substance Abuse Professional (SAP) for assessment and supported through a treatment and aftercare program consistent with the Substance Abuse Professional's recommendations and the applicable benefit coverage. The company will work in conjunction with the employee and SAP to find an appropriate community based treatment program/facility. Employees should understand that accessing assistance or declaring a problem does not eliminate the requirement for maintenance of satisfactory performance levels. Discipline or testing cannot be avoided by a request for assistance with a problem or by disclosure that the individual is already involved in a treatment program.

Where a medical professional, substance abuse professional, or other counseling professional advises that there may be a risk that would prevent an employee from doing their job safely, a medical work modification may be issued, and the individual may be assigned to alternate duties if available and at the discretion of the company.

##### **Aftercare**

All employees who complete primary treatment (e.g. residential or out-patient treatment) for alcohol or drug problems as a result of a referral will be required to participate in an aftercare program recommended by the SAP or appropriate addictions professional when returning to work in order to help them maintain recovery. They will be expected to enter into a written agreement, which will outline the conditions governing their return to the job, and the consequences for failing to meet those conditions.

##### **Confidentiality**

Confidentiality will be maintained to the extent possible, except where limited disclosure is necessary for related health and safety concerns. (e.g. there is deemed to be a potential for risk to self, others or the company). That is, only the information strictly limited to the level of functionality of a worker (e.g. fitness for work and any restrictions that may apply) may be shared with management for purposes of determining fitness for work, appropriate work accommodation, and/or work re-entry initiatives. Records will be kept secured manner and only accessible by the Program Administrator and VP HS&E.

#### **7.2 Investigative Procedures**

##### **Performance Management**

The normal process of job performance management will continue to be emphasized. Through this process, individuals with apparent performance problems will be reminded that they should access assistance should a personal problem be affecting their job performance.

##### **Unfit for Work Situations**

In all situations when there are grounds to believe an employee is unfit to be on the worksite, responsible escort procedures will be followed. The employee will be escorted to a safe place and given an opportunity to explain why they appear to be in a condition unfit for work. If the supervisor conducting the interview still believes the employee is in a condition unfit for normal work, and after consultation and agreement of a second supervisor or one up whenever possible, they may take any of the following actions as appropriate:

- Referral for medical attention if there are immediate medical concerns (health center, local hospital or clinic); or
- Referral for an alcohol and drug test if there are grounds to believe alcohol or drug use may be a factor in the situation; or
- Any other action appropriate to the situation.

Transportation will be provided to the sample collection site, or hospital/clinic depending on the circumstances, and then to their place of residence or the care of another person. The employee may be temporarily held out of service or reassigned pending completion of an investigation.

### 7.3 Alcohol and Drug Testing

All employees will be subject to testing in the following circumstances. Procedures for testing are found in Appendix C.

#### 6.3.1 Reasonable Cause

Alcohol and drug testing will take place whenever the company has reasonable grounds to believe that the actions, appearance or conduct of an individual while at work are indicative of the use of drugs or alcohol. The decision to test shall be made by the supervisor, with concurrence of a second supervisor or one up wherever possible. The referral for a test will be based on specific, personal observations resulting from, but not limited to such indicators as:

- Observed use or evidence of use of a substance (e.g. smell of Liquor);
- Erratic or atypical behavior or changes in behavior of the employee;
- Changes in the physical appearance or speech patterns of the employee;

Individuals tested in this circumstance will be removed from work until the investigation is complete. Depending on the test result, a fitness for work assessment may also be required.

#### 6.3.2 Post Incident Testing

Alcohol and drug testing may be required after a significant work-related incident as part of an investigation into the circumstances. The supervisor or manager of an employee or contractor must request an employee to submit to an alcohol and drug test if the supervisor or manager and the next level of management present at the workplace, if any, have reasonable grounds to believe that an employee or contractor was involved in an incident or near miss. The supervisor or manager must provide the reason for the test to the employee or contractor. Investigating the incident, after consultation with another supervisor or one up whenever possible.

Reporting of an incident:

- Employees are expected to report a situation to their immediate Manager as soon as possible after the incident;
- Employees are expected to participate fully in any subsequent investigation; and
- Failure to report an incident is a violation of this Program.

The following procedures apply:

- A supervisor or manager of an employee must request an employee to submit to an alcohol and drug test if the supervisor or manager and the next level of management present at the workplace, if any, have reasonable grounds to believe that the employee was involved in an incident or near miss;
- A supervisor or manager of an employee must provide to the employee the reason for the request for test;
- A supervisor or manager must make the request immediately following an incident or near miss unless it is not practicable or reasonable to do so until a later time (within 8 hrs max);
- A supervisor or manager of an employee need not request the employee to submit to an alcohol and drug test if the supervisor or manager in consultation with the Vice President of HS&E and/or CEO conclude that there is objective evidence to believe that the use of alcohol and drugs did not contribute to the cause of the incident or near miss;
  - Arrangements for testing should be made as soon as possible unless this is impossible because medical attention is required;
- The need for a test must be documented as part of the preliminary investigation as soon as practical after the triggering event;
- A test will not be necessary if there is clear evidence that the acts or omissions of employees could not have been a contributing factor (e.g. structural or mechanical failure, or environmental factors) and must be authorized by the Vice President HSE and/or the CEO;
- Employees referred for a test will only be those who are identified, with reasonable grounds, as having been directly involved in the chain of acts or omissions leading up to the event ;
- Employees must not use alcohol after an incident until tested or advised by the company that a test is not required.
- If there is any reason for delay the supervisor will stop attempting collection at 8 hours after the incident for alcohol testing and 32 hours for drug testing. In addition to the testing circumstances set out under this employee program, testing may also be required in additional circumstances as part of an investigation into an incident on a client site at that client's direction. In the case of a less significant incident, if the supervisor concludes that alcohol or drug use may have been a factor, a reasonable cause test would be required.

### **Return to Work - Post Treatment**

Unannounced testing may be used as a monitoring tool as determined on a case by case basis to support the recovery of any individual returning to work after primary treatment for an alcohol or drug problem.

### **Return to Work – Post Violation**

In those situations where employment is continued after a violation of this Program, individuals will be required to pass a return to work test and may be subject to unannounced testing for a minimum of two years.

### **Customer Sites**

Site access or random testing of NCSG employees may be required as a contractual condition of doing business with certain customers and/or as a condition of being allowed on certain sites or locations.

### **Failure to Test**

Failure to report directly for a test, refusal to submit to a test, refusal to agree to disclosure of a test result to the Program Administrator, a confirmed attempt to tamper with a test sample, or failure to report involvement in an incident which may require testing, are a violation of this policy.

### **Possession of Alcohol or Drugs**

NCSG reserves the right to investigate any situation when there are reasonable grounds to believe that alcohol or illicit drugs are present on Company premises in violation of this Program. In addition while on client worksites or locations, the clients have the right to conduct searches of personnel and property. Refusal of such searches may result in that person being removed immediately from the client's worksites or locations.

Supervisors are responsible for identifying situations where an investigation is justified based on a combination of indicators, which could include behavior, odour, or presence of drug related paraphernalia. They will be responsible for advising the next level of management of the situation, who will make the decision as to whether to initiate an investigation, and who will conduct it.

### **Loss of License/Impaired Driving Charge**

All employees who regularly or periodically operate any motor vehicle on behalf of NCSG must maintain a valid driver's license. Any loss of license must be reported to their supervisor immediately and the individual will no longer be qualified to drive on behalf of the company.

In addition, employees must inform their supervisor immediately if they have been charged with an impaired driving offense when operating a Company vehicle or driving on behalf of NCSG. Impaired driving would include but not be restricted to testing over the legal BAC in that jurisdiction, driving while impaired, or refusal to blow into a breath analyzer or provide a sample for testing. Receipt of a charge will result in a full investigation, and resulting disciplinary action appropriate to the situation. Failure to report the charge will be grounds for discipline up to and including termination of employment.

## **7.4 Consequences**

### **General Expectations**

Any violations of the provisions of this Policy and Process are grounds for discipline up to and including termination of employment. In all situations, an investigation will be conducted and documented to verify that a violation has occurred before disciplinary action is taken.

Management has the authority and discretion to hold out of service any individual who is believed to be involved in an incident that could lead to disciplinary action pending the results of the investigation. The appropriate discipline in a particular case depends on the nature of the violation and the circumstances surrounding the situation; the severity of the violation will warrant entering the discipline process at different levels.

Possession of illicit drugs on company premises or worksites, possession of any product which may be used to tamper with the testing process and failure to complete the testing process are grounds for termination of employment.

A positive drug test and an alcohol test result of .04 BAC or higher are considered a violation of this policy. At a risk sensitive operating location, an alcohol test result of .02 to .039 BAC will result in removal from the workplace until at least the next shift, and is grounds for progressive discipline.

### **Conditions of Continued Employment**

Should the company determine that employment will be continued in a specific circumstance, the individual shall be required to enter into an agreement governing their continued employment which may require any or all of the following actions, or any other condition appropriate to the situation:

- Temporary removal from their position;
- Assessment by a Substance Abuse Professional (SAP) to determine the need for a structured treatment program;
- Adherence to any recommended treatment and aftercare program;
- Maintenance of sobriety and satisfactory performance on return to work;
- Successful completion of a return to work test;
- Ongoing unannounced testing for a period determined on a case by case basis; and
- No further violations of the Program.

Where applicable, the employee's union will be involved in this process. The company will work in conjunction with the employee and SAP to find an appropriate community based treatment program/facility. Consequences for failure to meet the requirements of the agreement during the monitoring period will be set out in the individualized agreement.

## 8.0 TRAINING MATERIAL

- Employee Alcohol and Drug Program - Awareness Training Course / New Employee Orientation
- Supervisors Alcohol and Drug Program - Training Course

## 9.0 RESOURCES

Contact the Program Administrator or a representative of the Health, Safety and Environment team for more information regarding this Program.

## 10.0 APPENDICIES

- Appendix A – Guideline on Hosting Events
- Appendix B – Guideline on Medications
- Appendix C – Alcohol and Drug Testing Procedure
- Appendix D - Failure to Participate in Alcohol and Drug Testing
- Appendix E - Alcohol and Drug Testing Results
- Appendix F - USA Specific – Mullen Crane & Transport Process

## 11.0 SUPPORTING DOCUMENTS

### 11.1 General

- NCSG Alcohol and Drug Requirements for Contractors and Contract Workers
- Wallet Card

### 11.2 Procedures

- Performance Management Procedures
- Investigation Procedures
- Testing Procedures
- SAP Referral Procedures

## APPENDIX A – Guideline on Hosting Events

Company Social Events: The use of alcohol in conjunction with any off site company social event is permitted with the prior approval of the appropriate Vice President and in accordance with the following guidelines:

1. Professional/trained servers will work at each event and/or will supervise the use of untrained servers.
2. Each event will have a designated "chief host/hostess" (with assistance from others) with responsibility for:
  - Obtaining appropriate permits;
  - Establishing the general tone of the event;
  - Acting as the sole contact with the servers during the function regarding opening and closing times, food and beverage arrangements, etc.;
  - Ensuring bars are attended at all times;
  - Ensuring alcohol is not served to individuals who appear to be intoxicated;
  - Taking steps to prevent abusive or unsafe behaviour;
  - Taking steps to prevent an apparently intoxicated attendee from driving after the function;
  - Providing alternate transportation or accommodation where necessary; and
  - Contacting the police if an incident occurs or an attendee disregards advice and attempts to drive in an intoxicated state.
3. In all situations, events will be managed in a way that avoids the potential for accidents, including identifying and eliminating potentially harmful situations.
4. Responsible serving practices will include providing food and non-alcoholic drinks throughout the event, as well as coffee and tea after the bar has closed, establishing a firm time to end the event, and stopping service of alcohol at least one hour prior to the event being over.
5. Any hosting situation that results in inappropriate behaviour or risk to health and safety of attendees or the community will result in a review of these guidelines and active steps to ensure the problems do not occur again.

Business Hosting: Consistent with the above standards, if alcohol is made available to NCSG guests in the course of conducting business (e.g. client lunch or dinner, conference/seminar situation) employees are expected to use judgment and be responsible in hosting others.

Note: additional information can be found at:

- [http://www.camh.net/About\\_Addiction\\_Mental\\_Health/Drug\\_and\\_Addiction\\_Information/having\\_party.html](http://www.camh.net/About_Addiction_Mental_Health/Drug_and_Addiction_Information/having_party.html)
- <http://www.madd.ca/english/research/liability.html>



## APPENDIX B – Guideline on Medications

All employees are expected to manage potential impairment during working hours due to the legitimate use of medications. The following drug categories have been associated with performance impairment and are provided as a guideline to employees in assessing their own situation. The list is not exhaustive; there are numerous other over-the-counter and prescription drugs which when taken may impact negatively on performance.

Therefore, employees are expected to consult with their physician or a pharmacist to determine if use of the medication will have any potential negative impact on job performance. If the medication they are using will affect their ability to operate safely, they are to advise their supervisor or designate of any need for modified duties.

NCSG reserves the right, through the Program Administrator, to confirm the nature and duration of modified work requirements with the treating physician, without any breach in medical confidentiality.

Medications that could negatively impact safety or work-performance include the following:

- a. Antihistamines – are widely prescribed for hay fever and other allergies (e.g., Allegra, Dimetane). They are also found in many cold medications. These medications may cause drowsiness.
- b. Motion Sickness Drugs – are used to prevent motion sickness and nausea (e.g., Gravol, Antivert). Side effects may include drowsiness.
- c. Barbiturates, Sedatives, Hypnotics, Tranquilizers, Antidepressants – are used to treat sleep disorders and depression (e.g., Ativan, Imovane, Paxil). Potential side effects may include mild sedation, hypnotic state, dizziness or drowsiness.
- d. Narcotics – (e.g., Demerol, Codeine, OxyCotyn, Percoset). Codeine is often found in combination drugs such as 222s or 292s or Tylenol 1,2,3s. Drowsiness, dizziness, and light-headedness may be side effects.
- e. Stimulants – Medication used for central nervous system stimulation and for appetite suppression can produce sensations of well-being which may have an adverse effect on judgment, mood and behavior (e.g., amphetamines or medications sold as “diet pills”).
- f. Anticonvulsants – are used to control epileptic seizures and can cause drowsiness in some patients (e.g., Dilantin).
- g. Muscle Relaxants – are used to treat musculoskeletal pain. Most common side effects are sedation and drowsiness (e.g., Flexeril, Robaxial).
- h. Cold Tablets/Cough Mixtures – in particular, nighttime remedies can cause drowsiness (e.g., Sinutab, Contac, Triaminic, Tussionex and preparations containing dextromethorphan (DM) or codeine).

The foregoing list is not intended to be exhaustive.

## APPENDIX C – Alcohol and Drug Testing Procedure

The procedures outlined within this appendix are specifically defined in the COAA - Canadian Model for Providing a Safe Workplace.

### ALCOHOL TESTING

#### General

1. The donor is the person from whom a breath or saliva sample is collected
2. The donor is informed of the requirement to test in private and is directed to go to a collection site/lab for the purpose of providing a breath or saliva specimen. The donor must be escorted to the collection site if the test is for random, follow up, post incident or reasonable cause purposes.
3. The breath alcohol technician (BAT) or the screening test technician (STT) as appropriate establishes the identity of the donor. Government or employer issued photo identification is preferable. Positive identification by a company representative who holds a supervisory position is acceptable.
4. The BAT or STT as appropriate explains the testing procedure to the donor
5. The company must securely store information about alcohol test results to ensure that disclosure to unauthorized persons does not occur.
6. Breath testing and saliva testing devices are used to conduct alcohol screening tests, with breath evidentiary devices used to confirm the screening tests. These devices must be listed on the National Highway Traffic Safety Administrations (NHTSA) conforming products list – the list for screening devices or the list for evidentiary devices. These devices must also meet the function requirements outlined in the U.S. DOT rules and regulations.

#### Breath Testing

1. The BAT and the donor complete those parts of the alcohol testing form that are to be completed before the donor provides a breath sample.
2. The BAT opens an individually wrapped or a sealed mouthpiece in the presence of the donor and attaches it to the breath testing device in the prescribed manner.
3. The BAT explains to the donor how to provide a breath sample and asks the donor to provide a breath sample.
4. The BAT reads the test result and ensures that the test result is recorded on the alcohol testing form after showing the results to the donor.

5. The BAT completes the part of the alcohol testing form that is to be completed after the donor provides a breath sample and asks the donor to do so as well.
6. If the test result shows an alcohol level that is less than 0.020 grams/210 litres of breath, the BAT informs the donor that there is no need to conduct any further testing and reports the result in a confidential manner to the company's designated representative. While the initial communication need not be in writing, the BAT must subsequently provide a written report of the test result to the company's designated representative
7. If the test result shows an alcohol level that is equal to or greater than 0.020 grams/210 litres of breath, the BAT informs the donor of the need to conduct a confirmation test.

### **Saliva Testing**

1. The STT and the donor complete those parts of the alcohol testing form that are to be completed before the donor provides a sample.
2. The STT checks the expiration date of the saliva testing device, shows the date to the employee and uses a saliva testing device only if the expiration date has not passed.
3. The STT opens an individually wrapped or a sealed package containing the saliva testing device in the presence of the donor.
4. The STT invites the donor to insert the saliva testing device into the donor's mouth for the time it takes to secure a proper specimen.
5. The STT reads the result the saliva testing device produces and records the test result on the alcohol testing form after showing the results to the donor.
6. The STT completes the part of the alcohol testing form that is to be completed after the donor provides a saliva sample and asks the donor to do so as well.
7. If the test result shows an alcohol level that is less than 0.020 grams of alcohol in 100 millimetres of saliva or an equivalent concentration in other units, the STT informs the donor that there is no need to conduct any further testing and reports the result in a confidential manner to the company's designated representative. While the initial communication need not be in writing, the STT must subsequently provide a written report of the test results to the company's designated representative.
8. If the test result shows an alcohol level that is equal to or greater than 0.020 grams of alcohol in 100 millilitres of saliva or an equivalent concentration in other units, the STT informs the donor of the need to conduct a confirmation test.

### **Confirmation Test – (completed as required)**

1. If a breath alcohol testing device was used for the screening test, an evidential breath alcohol device must be used to conduct the alcohol confirmation test, should the test be required. If a saliva testing device was used for the screening test, the confirmation test will use an evidential breath alcohol testing device.
2. The BAT advises the donor not to eat, drink, put anything in their mouth or belch before the confirmation test is complete.
3. The confirmation test must start not less than fifteen minutes after the completion of the screening test and not more than thirty minutes after the completion of the screening test. If the confirmation test cannot begin within 30 minutes, the elapsed time and reason must be documented on the alcohol testing form.
4. The BAT and the donor complete those parts of the alcohol testing form that are to be completed before the donor provides a breath sample.
5. The BAT opens a new individually wrapped or sealed mouthpiece in the presence of the donor and inserts it into the breath testing device in the prescribed manner.
6. The BAT explains to the donor how to provide a breath sample and asks the donor to provide a breath sample.
7. The BAT reads the test result on the device and shows the donor the result displayed. If the confirmation test result is equal to or in excess of 0.040 grams per 210 litres of breath, the BAT will do an external calibration check (accuracy check) to ensure the device is in working order. The BAT ensures that the test result is recorded on the alcohol testing form. The BAT verifies the printed results with the donor.
8. The BAT completes the part of the alcohol testing form that is to be completed after the donor provides a breath sample and asks the donor to do so as well.
9. The BAT immediately reports in a confidential manner the test results to the company's designated representative. While the initial communication need not be in writing, the BAT must subsequently provide a written report of the test result to the company's designated representative.

## DRUG TESTING

### Urine Testing

1. The donor is the person from whom a urine specimen is collected.
2. The donor is informed of the requirement to test in private and is directed to go to a collection site. The donor must be escorted to the collection site if the test is for random, follow up, post incident or reasonable cause purposes.
3. The collection site person must establish the identity of the donor. Government or employer issued photo identification is preferable. Positive identification by a company representative who holds who holds a supervisory position is acceptable.
4. The donor must remove coveralls, jacket, coat, hat or any other outer clothing and leave these garments and any briefcase or purse with the collection site person.
5. The donor must remove any items from his or her pockets and allow the collection site person to inspect them to determine that no items are present which could be used to adulterate a specimen.
6. The donor must give up possession of any item which could be used to adulterate a specimen to the collection site person until the donor has completed the testing process. Clear evidence of an attempt to adulterate or substitute is a refusal to test and ends the collection process.
7. The collection site person may set a reasonable time limit for providing a urine specimen.
8. The collection site person selects or allows the donor to select an individually wrapped or sealed specimen container. Either the collection site person or the donor, in the presence of the other, must unwrap or break the seal of the specimen container.
9. The donor may provide his or her urine specimen in private, in most circumstances. The specimen must contain at least forty-five millilitres.
10. In respect of any collection that may be incomplete or determined to be a refusal, the collection site must promptly document all circumstances and details respecting the collection effort and the reasons it was incomplete.
11. The collection site person determines the volume and temperature of the urine in the specimen container.
12. The collection site person inspects the specimen and notes on the custody and control form any unusual findings.
13. If the temperature of the specimen is outside the acceptable range or there is evidence that the specimen has been tampered with, the donor must provide another specimen under direct observation in accordance with U.S. DOT rules and regulations by the collection site person or another person if the collection site person is not the same gender as the donor.
14. The collection site person splits the urine specimen into two specimen bottles. One bottle is the primary specimen and the other is the split specimen.
15. The collection site person places a tamper-evident bottle seal on each of the specimen bottles and writes the date on the tamper-evident seals.
16. The donor must initial the tamper evident bottle seals to certify that the bottles contain the urine specimen the donor provided.
17. The donor and the collection site person complete the custody and control form and seal the specimen bottles and the lab copy of the custody and control form in a plastic bag.
18. The collection site personnel arrange to ship the two specimen bottles to the lab as quickly as possible.
19. The lab must be the holder of a certificate issued by the Substance Abuse and Mental Health Administration of the United States Department of Health and Human Services under the National Laboratory Certification Program.
20. The lab must use chain of custody procedures to maintain control and accountability of urine specimens at all times.
21. Laboratory personnel inspect each package along with the enclosed specimens for evidence of possible tampering and note evidence of tampering on the specimen forms.
22. Laboratory personnel conduct validity testing to determine whether certain adulterants or foreign substances were added to the urine specimen.
23. Lab personnel conduct an initial screening test on the primary specimen for the drugs set out in 3.1 using established immunoassay procedures. No further testing is conducted if the initial screening test produces a negative test result.
24. Lab personnel conduct a confirmatory test on specimens identified as positive by the initial screening test. The confirmatory test uses approved mass spectrometry techniques.
25. A certifying scientist reviews the test results before certifying the results as an accurate report.
26. The lab reports the test results on the primary specimen to the company's medical review officer (MRO) in confidence.
27. If the laboratory reports a positive, adulterated, substituted or invalid result, the certified MRO attempts to conduct a verification interview with the donor to allow the opportunity for the donor to discuss results and present legitimate medical explanation. Once the interview is complete, the MRO shall report to the employer whether the test result is

negative, negative with safety advisory, refusal to test and why, cancelled with or without further direction or positive. A safety advisory indicates a medical clearance is required prior to performing safety-sensitive duties in accordance with the job description.

28. An employee who has received notice from the MRO that he or she has tested positive may ask the MRO within 72 hours of receiving notice that he or she has tested positive to direct another lab to test the split specimen. The employer is permitted to seek reimbursement from the employee.
29. The laboratory reports the test results on the split specimen to the company's MRO in confidence. Should the laboratory fail to reconfirm the split specimen results, the MRO will provide direction to the company's designated representative.

### **Oral Fluid Testing**

1. The donor is the person providing their oral fluid for the purposes of a drug test.
2. The donor is informed of the requirement to test in private and is directed to go to a collection site. The donor must be escorted to the collection site if the test is for random, follow up, post incident or reasonable cause purposes.
3. The collector must establish the identity of the donor. Government or employer issued photo identification is preferable. Positive identification by a company representative who holds a supervisory position is acceptable.
4. The donor must clear any foreign material from the mouth i.e.: food, gum, tobacco products, lozenges etc.
5. The collector observes donor for a minimum of ten (10) minutes prior to providing the specimen. Donor may not eat, drink smoke or put anything in their mouth during the observed waiting period
6. The collector checks and records the lot number and expiration date of the device.
7. In the presence of the collector, the donor opens the sealed device and the specimen is collected according to the manufacturer's specification.
8. The collected specimen should be kept in view of the donor and the collector at all times prior to it being sealed and labelled for shipment to the lab.
9. The collection site person places a tamper-evident seal on the specimen collection device,
10. The collector records the date, and has the donor initial the seal(s) on the specimen(s).
11. The donor and the collection site person complete the custody and control form and seal the specimen(s) and the lab copy of the custody and control form in a chain of custody bag. In respect of any collection that may be incomplete or determined to be a refusal, the collection site person must promptly document all circumstances and details respecting the collection effort and the reasons it was incomplete.
12. The collection site personnel arrange to ship the two specimen bottle to the laboratory as quickly as possible.
13. The lab must be the holder of a certificate issued by the Substance Abuse and Mental Health Services Administration of the United States Department of Health and Human Services under the National Laboratory Certification Program.
14. The lab must use chain of custody procedures to maintain control and accountability of specimens at all times.
15. Lab personnel inspect each package along with the enclosed specimen(s) for evidence of possible tampering and note evidence of tampering on the specimen forms.
16. Lab personnel conduct validity testing to determine the suitability of the specimens.
17. Lab personnel conduct an initial screening test on the specimen for the drugs set out in 3.1 using established immunoassay procedures. No further testing is conducted if the initial screening test produces a negative test result.
18. Lab personnel conduct a confirmatory test on specimens identified as positive by the initial screening test. The confirmatory test uses approved mass spectrometry techniques.
19. A certifying scientist reviews the test results before certifying the results as an accurate report.
20. The laboratory reports the test results on the primary specimen to the company's medical review officer (MRO) in confidence.
21. If the laboratory reports a positive, adulterated, substituted or invalid result, the certified MRO attempts to conduct a verification interview with the donor to allow the opportunity for the donor to discuss the results and present legitimate medical explanation. Once the interview is complete, the MRO shall report to the employer whether the result is negative, negative with safety advisory, refusal to test and why, cancelled with or without further direction or positive. A safety advisory indicates a medical clearance is required prior to performing safety-sensitive duties in accordance with the job description.
22. An employee who has received notice from the MRO that he or she has tested positive may ask the MRO within 72 hours of receiving notice that he or she has tested positive to direct another lab to retest the specimen. The employer is permitted to seek reimbursement from the employee.
23. The lab reports the results of the retest to the company's MRO in confidence. Should the laboratory fail to reconfirm the test result, the MRO will provide direction to the company's designated representative.

## APPENDIX D - Failure to Participate in Alcohol and Drug Testing

### Refusal to Submit to Testing

- Failure to submit to Alcohol and Drug pre-screening for safety or risk sensitive work positions as a condition of the “New Hire” process or positions requiring Alcohol and Drug pre-screening (Pre-Access Testing) by customers to facilitate access to site, will result in the withdrawal of any and all offers of employment from NCSG Crane & Heavy Haul Services and its affiliated companies (NCSG), rendering the offers null and void
- Should an employee refuse to submit to Alcohol and Drug testing when involved in an incident, accident or near miss situation as mandated by this policy and/or by customer site regulations;
  - HS&E, supervisor, or the branch manager as applicable will ensure that the employee refusing to submit to testing fully understands their requirements according to NCSG Alcohol and Drug Policy, as to why they are specifically being required to submit to testing and the potential ramifications of refusing the test
  - Should the employee continue to refuse to submit, human resources and Vice President HSE shall be contacted immediately. An employee that refuses testing is to wait at the site to speak with senior management and is not under any circumstances to return to work. Should the employee leave the site, they are refusing a direct request to remain on site and the employee is to be made fully aware that their departure could be viewed as a formal resignation from employment
- Should a manager, supervisor or member of the HS&E have reasonable cause to suspect an employee is “Unfit for Duty” and under the influence of Alcohol or Drugs; the employee will be required to submit to a Alcohol and Drug Test. In order to require a test for reasonable cause, at least two employees of NCSG, with one (1) employee in a minimum of a supervisory position with NCSG; must believe the employees’ behaviour, actions or speech are such that the employee is “Unfit for Duty”
  - If the determination is made that “Reasonable Cause” exists to suspect the employee may be under the influence of Alcohol or Drugs; and the employee has refused to submit to a required Alcohol and Drug Test, the employee will not be allowed to return to work and;
  - HS&E, supervisor, or the branch manager as applicable will ensure that the employee refusing to submit to testing fully understands their requirements according to NCSG Alcohol and Drug Policy and why they are specifically being required to submit to testing and the potential ramifications of refusing the test.
  - Should the employee continue to refuse to submit to testing, human resources and the Vice President HSE shall be contacted immediately. Should the employee leave the site, they are refusing a direct request to remain on site and the employee is to be made fully aware that their departure could be viewed as a formal resignation from employment.

## APPENDIX E - Alcohol and Drug Testing Results

### Alcohol Testing Results

- Should an employee participate in Alcohol Testing as outlined in Appendix A – Alcohol and Drug Testing Procedures and receive a positive result for alcohol with a reading in the range of 20 – 40 milligrams in 100 millilitres of blood. NCSG will impose a 24 hour suspension without pay and a written warning will be placed in the employees file for the first infraction or positive result of this level. The written warning will remain in the employees file for a period of 24 months from the infraction date, due to the nature and severity of the violation
- Should an employee receive a second offence or similar positive test result (between 0.02 and 0.04 mg/ml) the infraction will result in the employee’s immediate dismissal
- An employee that tests positive for a blood alcohol level in excess of 40 milligrams per 100 millilitres of blood will be subject to immediate dismissal. Should an employee be dismissed for a positive blood alcohol level in excess of 0.04 mg/ml they will not be eligible to work with NCSG for a period of not less than 24 months
- As NCSG is committed to safety; an employee that has been dismissed as a result of a Drug and Alcohol infraction will not be eligible for consideration re-hire for a minimum of 24 months and will be required to have completed a recognized and relevant rehabilitation program. Including an in-house rehabilitation program and successful completion of the out patient treatment or counselling services. Final decision to rehire will rest with the Vice President of HSE and/or the CEO and may rely upon a risk based decision.
- In the event the employee is allowed to return in addition to the conditions above , the employee will be required to sign NCSG’s Zero Tolerance Agreement. The Zero Tolerance Agreement outlines the employees agreement to participate in random or unannounced screening and their acceptance of immediate dismissal should they test positive for alcohol or drugs

NCSG will support the efforts of any employee that may be aware they have an issue with alcohol should they request assistance in their endeavours to seek the appropriate medical and addiction counselling. NCSG will assist the employee in their efforts to meet with a qualified professional for an assessment of their alcohol use and will work with the employee to return them to gainful employment pending successful completion of a substance abuse program. NCSG further recognizes an employees’ right to privacy and any and all problems of this nature will be handled with discretion and confidentiality will be maintained.

## Drug Testing Results

- Should an employee participate in Drug Testing as outlined in Appendix A – Drug and Alcohol Testing Procedures and receive positive results equal to or in excess of the concentrations or drug levels itemized within the charts below; the employee will be subject to immediate dismissal:

### Urine Drug Concentration Limits: \*\*\* concentrations directly linked to COAA & subject to change

Drugs or Classes of Drugs	Screening Concentration Equal to or in excess of Ng/ml	Confirmation concentration Equal to or in excess of Ng/ml
Marijuana metabolites	50	15
Cocaine metabolites	150	100
Opiates • Codeine • Morphine	2000	2000 2000
6-Acetylmorphine	10	10
Phencyclidine	25	25
Amphetamines/Methamphetamines • Amphetamine • Methamphetamine	500	250 250
MDMA • MDMA • MDA • MDEA	500	250 250 250

### Oral Fluid Drug Concentration Limits: \*\*\* concentrations directly linked to COAA & subject to change

Drugs or Classes of Drugs	Screening Concentration Equal to or in excess of Ng/ml	Confirmation concentration Equal to or in excess of Ng/ml
Marijuana metabolites	4	2
Cocaine metabolites • Cocaine or Benzoylgonine	20	8
Opiates • Codeine • Morphine	40	40 40
6-Acetylmorphine	4	4
Phencyclidine	10	10
Amphetamines/Methamphetamines • Amphetamine • Methamphetamine	50	50 50
MDMA • MDMA • MDA • MDEA	50	50 50 50

NCSG Crane & Heavy Haul Services and its affiliated companies will support any employee that may be aware they have an issue with drugs should they request assistance in their effort to seek the appropriate medical and addiction counselling. NCSG will assist the employee in their efforts to meet with a qualified professional for an assessment of their drug use and will work with the employee to return them to gainful employment pending successful completion of a substance abuse program. NCSG further recognize an employees' right to privacy and any and all problems of this nature will be handled with discretion and confidentiality will be maintained.

**PROCEDURE INFORMATION:**

This process in addition to the requirements detailed within the NCSG Crane & Heavy Haul, Alcohol & Drug Policy and Related Processes applies to all US based employees/subcontractors of NCSG Crane & Heavy Haul Services Inc.

This document contains processes in specific detail for the drug and alcohol testing for NCSG Crane & Heavy Haul Services Inc. Our policy prohibits the use of all illegal drugs, including legally regulated drugs, unless prescribed by a licensed physician. NCSG Crane & Heavy Haul Services Inc. also prohibits being under the influence or consuming alcoholic beverages during business hours.

**PROHIBITONS:**

Unless specifically authorized in writing by your Branch Manager and/or Customers, NCSG Crane & Heavy Haul Services Inc.'s process shall prohibit all employees/subcontractors from the following:

- 1 Using, possessing, selling, manufacturing, distributing, concealing or transporting, on NCSG Crane & Heavy Haul Services Inc. and/or Client property any firearms, ammunition, explosives, weapons, and any of the following illegal substances, as defined by the Federal and State laws, including all prescription drugs that have not been prescribed by a licensed physician.

NCSG Crane & Heavy Haul Services Inc. retains a third-party administrator to perform all drug & alcohol testing and reporting procedures. Should an employee participate in Drug & Alcohol Testing and receive positive results equal to or in excess of the concentrations of drug levels itemized within the charts below; the employee will be subject to disciplinary action up to and including immediate dismissal:

DRUGS	SCREEN LEVEL	CONFIRM LEVEL
Amphetamines	300 ng/mL	
Amphetamines		250 ng/mL
Methamphetamine		250 ng/mL
MDA Analogues	250 ng/mL	
MDA		200 ng/mL
MDMA		200 ng/mL
MDEA		200 ng/mL
Barbiturates	300 ng/mL	100 ng/mL
Benzodiazepines	300 ng/mL	100 ng/mL
Cocaine Metabolites	150 ng/mL	100 ng/mL
Marijuana Metabolites	20 ng/mL	10 ng/mL
Methadone	300 ng/mL	100 ng/mL
Methaqualone	300 ng/mL	200 ng/mL
Opiates	2000 ng/mL	2000 ng/mL Morphine 2000 ng/mL Codeine
6-Acetylmorphine (6-AM)	10 ng/mL	10 ng/mL Heroin
Phencyclidine (PCP)	25 ng/mL	25 ng/mL
Propoxyphene	300 (ng/ml)	200 (ng/ml)
Alcohol	0.02% (BAC)	0.04% (BAC)
<p><b>NOTE:</b> Alcohol screening and confirmation methods are conducted according to DOT protocol.</p> <p>Substances and levels may be modified when applicable.</p>		

**JOB SITE SPECIFIC:**

- 1 Searches and Inspections
  - All NCSG Crane & Heavy Haul Services Inc. employees/subcontractors are required to uphold not only NCSG Crane & Heavy Haul Services Inc.'s policies and procedures, but also those of our clientele. Some of our client's may request all employees/subcontractors, on their job site, to submit to a search and inspection of all personal and business property.

- These searches and inspections may or may not be announced, and may include wallets, purses, lockers, baggage, offices, desks, toolboxes, clothing, and vehicles.
  - Clients may also use outside parties to assist in searches and inspections.
  - Any employee/subcontract that refuses to participate in a job site search and inspection will be removed from the client's job site immediately.
- 2 Client Drug & Alcohol Requirements
- All NCSG Crane & Heavy Haul Services Inc. employees/subcontractors will be required to comply with our clients' drug & alcohol policies, and may need to furnish proof of a current drug & alcohol test.
    - All employees/subcontractors working on certain job sites will need to have proof that they have been tested with in the current year.
- 3 Any employee/subcontractor that refuses to submit to the requirements of job site specific processes will be considered to be in violation and be removed from the job site permanently, and may be disciplined up to and including termination.

**PROCEDURES:**

In accordance with the NCSG Crane & Heavy Haul Services, Alcohol & Drug Policy and Related Processes, a urine drug test and alcohol breathalyzer shall be administered for the following circumstances.

- 1 New Employee/Subcontractors pre-screening.
- All new employees/subcontractors must submit to a urine drug test and alcohol breathalyzer. These tests will test for illegal drugs, the illegal consumption of prescription drugs, and alcohol. If the new employee/subcontractor refuses to the testing they will not be permitted to work for NCSG Crane & Heavy Haul Services Inc.
  - If a former employee/subcontractor has provided a urine drug test & alcohol breathalyzer through DISA and their account status is active, then they do not have to be tested again. However, if their DISA account is inactive the returning employee/subcontractor will have to submit to testing.
    - An employee/subcontractor's active status in the DISA database will be set depending on the reason for separation of employment with Mullen Crane & Transport, Inc.
      - An employee/subcontractor will remain active in the database for 14 days if and only if they have a status of lay off.
      - An employee/subcontractor will be removed immediately out of the database for voluntary or involuntary termination.
- 2 Random testing:
- Employees/subcontractors will be randomly selected for unannounced drug & alcohol testing. Once DISA supplies the random testing list employees/subcontractors, branch managers, and their administrative staff will be notified and are provided 7 calendar days to complete all necessary testing.
  - All employees/subcontractors must complete their random testing within an hour of notification.
    - Branch managers and administrative staff are not to inform the employee/subcontractor of their random tests until they are able to complete it within an hour's time, but should have them complete testing with in the 24 hour window after initial notification.
  - NCSG Crane & Heavy Haul Services Inc.'s monthly random testing program shall yield a compliance of an annualized rate of 50%.
- 3 Testing for Suspicion of Drug & Alcohol abuse:
- All employees/subcontractors may be tested for suspicion of consumption when reasonable belief exists that the employee/subcontractor appears to be to be under the influence of illegal drugs, alcohol, or misuse of prescription drugs.
  - Suspicion of use can only be determined by Management, and all observations must be documented.
  - All employees/subcontractors being test for reasonable cause will not be allowed to return to work until negative test results have been processed and the Vice President HS&E authorizes their return.
- 4 Accident/Incident related testing:
- All employees/subcontractors who cause an accident or incident that results in property damage, a significant near miss or requires medical treatment will be required to submit to a drug & alcohol test. Waiver of testing can only be granted by the Vice President HS&E or CEO after a detailed review of the cause and contributing factors.
    - All employees/subcontractors being test for post-accidents will not be allowed to return to work until negative test results have been processed and confirmed.
    - These tests should be completed as soon as possible, but no than 8 hours after the accident.



## TESTING PROCEDURES:

- 1 All employees/subcontractors and subcontractors must have a DISA membership or current drug & alcohol testing documents.
  - New employees/subcontractors and employees/subcontractors classified as inactive in the DISA database will need to fill out a membership application.
    - All membership applications need to be faxed, emailed, or mailed to the company's Safety Admin or HR Coordinator.
- 2 The Safety Admin, HR Coordinator or HS&E Advisor(s) will instruct all employees/subcontractors on where they can have their DISA testing done.
  - All employee/subcontractor records are confidential.
  - All employee/subcontractor files will be housed at the United States headquarters located in Soda Springs, Idaho.
    - These records will be held for the federally determined time period.
- 3 Each applicant needs to read and sign a Drug & Alcohol testing consent form before submitting to testing.
- 4 All employees/subcontractors will need to fill out and present, at the testing site, a chain of custody form, and an alcohol test requisition form.
  - Analysis of urine tests will be performed by Quest Diagnostics Inc. This laboratory has Substance Abuse and Mental Health Services Administration (SAMHSA) certification, College of American Pathologists (CAP) and according to the requirements of such certification.
- 5 All new employees/subcontractors will be released from their probationary employment once all forms, training, and drug & alcohol testing results have been submitted.
- 6 All employees/subcontractors prescribed any medications or are taking any over the counter medications that may cause any form of impairment must notify their supervisor of this fact.
  - Please inform your supervisor or site supervisor before beginning your scheduled shift.
- 7 Any employee/subcontractor whose test results are positive for prohibited substances, including alcohol, will be subject to discipline up to and including termination.
- 8 If the employee/subcontractor feels that their tests results were inaccurate they may request to have their previously submitted specimen be retested. The Vice President HSE must be notified by Management immediately if this is requested.
- 9 Any switching or tampering with urine samples or any other testing samples will be viewed as a procedure violation, and the employee/subcontractor will be disciplined up to and including termination.

## CONFIDENTIALITY STATEMENT:

All drug & alcohol tests, forms, and results will be strictly confidential, and will only be used for the purpose of validating an individual's status for employment and job site specific access. For the release of all testing documentation, for the use of outside purposes; all employees/subcontractors must submit a signed request to their supervisor, branch manager, or the companies HR Coordinator.

## EMPLOYEE ACKNOWLEDGEMENT:

All NCSG Crane & Heavy Haul Services Inc. employees are required to sign and return a copy of the back page of the NCSG Employee Handbook. It must be understood that signing this document denotes acknowledgment and acceptance of the obligations of the Drug and Alcohol Testing process for NCSG Crane & Heavy Haul Services Inc. and consent to abide by them.

A copy of the DISA DCC Policy is also available for review. A copy of this policy may be obtained by contacting the company's Safety Admin or HR Coordinator.